

July 27, 2020

Tim Bzowey  
Executive Vice President, Auto/Insurance Products  
Financial Services Regulatory Authority of Ontario  
Auto Insurance Sector  
5160 Yonge Street, 16<sup>th</sup> Floor  
Toronto, Ontario M2N 6L9

Dear Mr. Bzowey,

**Re: Loss Trend Benchmarks**

Insurance Bureau of Canada (IBC) and its member property and casualty insurers welcome the opportunity to comment on the Financial Services Regulatory Authority of Ontario's (FSRA) *Loss Trend Benchmarks for Private Passenger Automobile Major Rate Filings* consultation. Ontario's private passenger vehicle auto insurance market is competitive, with 62 insurers having written premiums in 2019<sup>1</sup>. These insurers have different business models and target different consumer markets. They also have different philosophies on claims handling and reserving practices. Accordingly, projected ultimate claims costs and resulting trend rates will develop differently depending on each insurer's unique business model. Oliver Wyman's report acknowledged this, stating that its own trend rates *"... are based on industry data and **would not be expected to be the same as trend rates based on any individual insurer's own data.**"*<sup>2</sup>

Though individual companies are expected to have different trend rates from those of the industry as a whole, IBC retained Dr. Ron Miller to conduct a parallel Ontario trend rate analysis based on available GISA data up to December 31, 2019. Several of Dr. Miller's trend rates differ markedly from those of Oliver Wyman. Differing trend rates highlight the reality that in the Ontario claims environment, two qualified actuaries looking at the same set of data can develop very different projections. Accordingly, it is important that FSRA recognize that despite operating in the same market, insurers have very different claims development expectations. It is critical that FSRA permit Ontario insurers to use different trend rates based on their individual experiences.

The rest of our response looks at the significant uncertainty of the GISA development factors that form the foundation of Oliver Wyman's analysis, Dr. Miller's parallel trend rates including additional caveats on GISA data and a history of loss cost changes following historical Ontario reforms.

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<sup>1</sup> IBC with data from MSA

<sup>2</sup> Oliver Wyman report, page 65

## GISA Development Factor Concerns

The GISA 2019 Ontario Actual Loss Ratio Exhibit references that several major insurers have changed their reserving and reporting practices in recent years. Notably:

- A major writer changed its bodily injury and accident benefit reserves and claims handling practices which led to large number of claims without payment and with a \$1 case reserve for accident half-years 2016-2 to 2017-2<sup>3</sup>; and
- That **several major writers** corrected their historically under- or over-stated incurred and paid claim counts for various coverages for all accident half years between 2015-1 and 2019-1<sup>4</sup>.

Dr. Miller uses stronger language in interpreting bodily injury claims in particular, stating that:

*“...the recent TPL-BI data is fraught with issues related to recent changes in reporting patterns by a number of major writers, which makes estimated ultimate loss costs for recent periods even more uncertain than usual...in the fullness of time the true ultimate loss costs for recent periods may prove to be materially different from current estimates, and the currently estimated short term forward trends here may prove to be inaccurate, possibly materially”*

Despite these concerns, Oliver Wyman’s report states that FSRA believes that the GISA final selected development factors have fully accounted for these reporting issues. Yet the language used by GISA itself in its Actual Loss Ratio Exhibit suggests otherwise. GISA states that:

*“...the selection of loss development factors, for Bodily Injury in particular, at the early ages of development is **subject to even greater uncertainty than usual**”<sup>5</sup>*

This uncertainty is underscored by the significant differences in most trend rates between Oliver Wyman and Dr. Miller shown below. Given the heightened uncertainty around loss development factors, IBC recommends that in the future FSRA request that Oliver Wyman review published GISA loss development factors and include its findings in its final report.

## Future Trend Rate Benchmarks

IBC retained Dr. Ron Miller to conduct a parallel future trend rate analysis, the results of which are included in IBC’s submission. Oliver Wyman’s and Dr. Miller’s trend rates are shown in the table below.

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<sup>3</sup> 2019 Actual Loss Ratio Exhibit, page 8

<sup>4</sup> Ibid, page 9

<sup>5</sup> Ibid, page 9

### Oliver Wyman and Dr. Miller Future Trend Rates

	Oliver Wyman	Dr. Miller	Dr. Miller Difference
Accident Benefits	0.0%	+0.07%	+0.07 p/p
Bodily Injury	-7.5%	-4.49%	+3.01 p/p
DCPD	+9.2%	+8.53%	-0.67 p/p
Collision	+9.1%	+12.38%	+3.28 p/p
Comprehensive	+6.4%	+20.22%	+13.82 p/p
Total Coverages	+3.59%	+5.46%	+1.87 p/p

IBC with data from Oliver Wyman, Dr. Ron Miller

For some coverages, notably bodily injury, collision and comprehensive, Dr. Miller projects trend rates much higher than those of Oliver Wyman:

- Bodily injury costs will change by 3.01 percentage points less;
- Collision costs will increase by 3.28 percentage points more; and
- Comprehensive costs will increase by 13.82 percentage points more. The substantial difference between the two actuaries is because Oliver Wyman analyzed COMP-theft and non-theft combined, whereas Dr. Miller analyzed them separately. Dr. Miller found that theft costs beginning in 2017-1 have shown substantial annual increases.

Critically, on an all-coverage basis, Dr. Miller projects an increase of +5.46%, nearly two percentage points higher than Oliver Wyman's comparable figure of +3.59%. Across the entire industry, this difference is substantial, equal to additional claims of approximately \$170 million. The wide range of trend rates developed by two respected actuaries highlights the difficulties of predicting how Ontario claims will develop.

### **Importance of a Competitive Market**

FSRA has highlighted the importance of encouraging industry competition in order to benefit consumers. For example, in its most recent Budget consultation document, FSRA reiterated this priority, stating that:

*“Older, inflexible regulatory frameworks hold back innovators and limit consumer choice and the economic benefits of industry competition and innovation”*

And that,

*“FSRA is committed to supporting industry innovation, investment and growth, and to ensuring competition and continued new product availability.”*

Part of encouraging competition is acknowledging that the dozens of PPV auto insurers have very different claims experiences because they target different consumer markets. As an example of how uniformly-applied trend rates can impact insurers differently depending on its consumer mix, consider the differing claims experiences that have already occurred following the 2016 reforms. GISA territorial data below highlights the 2016 reform claims impact by select geographies.

Accident Benefits Loss Cost Decreases by GISA Territory

	Ontario Overall	Ottawa	Greater Toronto Area	Hamilton	Grey-Bruce*
<b>2016</b>	\$398	\$313	\$578	\$361	\$319
<b>2018</b>	\$336	\$238	\$471	\$322	\$335
<b>Percentage Change</b>	<b>(16%)</b>	<b>(24%)</b>	<b>(18%)</b>	<b>(11%)</b>	<b>5%</b>

IBC calculation with data from GISA exhibit AUTO3001-ON 2018. \*Grey-Bruce territory also includes the areas surrounding Lake Simcoe, Parry Sound, Muskoka and Haliburton. 2019 accident year data is not available yet.

In Ontario as a whole between 2016 and 2018, accident benefits loss costs decreased by 16%. Yet different regions saw very different rates of change. In Ottawa, accident benefits loss costs declined by 24%, while costs in Grey-Bruce actually *increased* by 5%. Insurers with different mixes of regional consumers have clearly had very different claims experience.

Similarly divergent claims experience was seen by gender. The table below shows the recent claims experience.

Accident Benefits Loss Cost Decreases by Gender

	Ontario	Male	Female
<b>2016</b>	\$398	\$398	\$402
<b>2018</b>	\$336	\$314	\$359
<b>Percentage Change</b>	<b>(16%)</b>	<b>(21%)</b>	<b>(11%)</b>

IBC calculation data from GISA exhibit AUTO2502-ON 2018, page 44. 2019 accident year data is not available yet.

Following the 2016 reforms, accident benefits loss costs for male drivers decreased at nearly twice the rate of female drivers.

Similarly varied claims experience can be shown based on any of the dozens of variables that insurers use to price their products. Therefore, any continued influence of the 2016 reforms will impact insurers differently depending on their consumer mix. Relying on a single actuary using all-industry data treats all companies, all books of business, and all geographic areas the same. This ultimately hinders competition in auto insurance.

## Historical Impact of Reforms

Multiple consecutive years of stable or declining loss costs is rare in Ontario from an historical perspective. Following other recent Ontario reforms, claims costs fell for a year or two before increasing again. Several historical Ontario examples are highlighted below.

### Bill 59 – Effective November 1, 1996

Bill 59, the *Automobile Insurance Rate Stability Act* decreased mandatory income replacement benefits from \$1,000 to \$400. The table below shows accident benefits loss costs before and after this reform.

#### Bill 59 Accident Benefits Loss Cost Impact

	1995	1996	1997	1998	1999	2000
<b>AB Loss Costs</b>	\$260	<b>\$251</b>	<b>\$180</b>	\$201	\$240	\$273
<b>Year-Over-Year Change</b>	-	-3%	<b>-29%</b>	+12%	+19%	+13%

*IBC with data from GISA*

In 1997, the first full year following the reforms, accident benefits loss costs fell by 29%. Cost stability only lasted for one year, as loss costs increased for each of the next three years.

### Bill 198 – Effective October 1, 2003

Bill 198, the *Keeping the Promise for a Strong Economy Act* introduced pre-approved treatment of minor whiplash injuries and a one-year ban on cash-out settlements. The table below shows accident benefits loss costs before and after this reform.

#### Bill 198 Accident Benefits Loss Cost Impact

	2002	2003	2004	2005	2006	2007
<b>AB Loss Costs</b>	\$354	<b>\$331</b>	<b>\$278</b>	\$302	\$331	\$375
<b>Year-Over-Year Change</b>	-	-6%	<b>-16%</b>	9%	10%	13%

*IBC with data from GISA*

In the first full year following the reforms, accident benefits loss costs fell by 16%. Cost stability only lasted for one year, as loss costs increased steeply thereafter.

Ontario Regulation 34/10 (New SABS) – Effective September 1, 2010

Due to rapidly increasing accident benefits claims costs and driver premiums, the government reformed *Ontario Regulation 34/10* by including:

- The introduction of the *Minor Injury Guideline* \$3,500 minor injury treatment cap;
- A reduction in med/rehab expenses from \$100,000 to \$50,000;
- The development of minor injury treatment guidelines; and
- A reduction in attendant care benefits for non-catastrophically injured claimants from \$72,000 to \$36,000.

The table below shows accident benefits loss costs before and after this reform.

Regulation 34/10 Accident Benefits Loss Cost Impact

	2009	2010	2011	2012	2013	2014	2015	2016
<b>AB Loss Costs</b>	\$588	\$582	\$325	\$325	\$356	\$356	\$388	\$387
<b>Year-Over-Year Change</b>	-	-1%	-44%	0%	9%	0%	9%	0%

*IBC with data from GISA*

As anticipated, accident benefits loss costs decreased considerably, falling by 44% in 2011, the first full year following the reforms and remained there in 2012. However, by 2013, loss costs were increasing again, leading to the most recent reforms in 2016.

Positive impacts of reforms on claims costs have often been short-lived because of changes to the claims environment, resulting from claimant behavioural adjustments to the reforms and from government or judicial decisions. Accordingly, several recent developments could lead to higher claims costs, such as:

- The pending government decision to eliminate juries at civil trials, which could increase claims costs because there is evidence that judge trials often award higher settlements than jury trials;
- The pending Civil Rules Committee decision to lower the discount rate that the courts use to set the present value of compensation for tort claims, which would increase the current value of settlements; and
- The recent *Tomec* decision which found that timelines for accident benefit entitlements outlined in the SABS may not be concrete and could lead to higher ultimate injury claim costs for past and present accident years.

Furthermore, though not a government or judicial decision, the impact of COVID-19 on future claims costs has yet to be determined. There are already signs that Ontarians are less willing to use public transit which could lead to greater vehicle use and claims than originally anticipated. There could also be increased use of income replacement benefits to account for income losses suffered during the economic fallout.

IBC expects that insurer-specific data will play an even more critical role than usual in determining the future impact of COVID-19 on claims costs.

## Conclusion

The Ontario claims environment is notoriously difficult to predict. GISA cautioned that due to reporting changes by several major insurers, recent-stage claims development is subject to more uncertainty than usual. Oliver Wyman acknowledged that individual insurer trend rates are expected to be different from the industry as a whole. This view is corroborated by Dr. Miller's selection of different trend rates, some markedly so, for several coverages despite relying on the same GISA data set as Oliver Wyman.

Finally, several years of stable or declining accident benefits and bodily injury claims costs are very rare in Ontario and recent government and judicial developments could contribute to a return to rising claims costs. The long-term impact of COVID-19 adds an additional layer of uncertainty. For these reasons, it is critical that FSRA continue to encourage competition in the Ontario auto insurance industry and allow insurers greater flexibility in relying on their own claims data to develop trend rates used in upcoming rate filings.

Thank you again for the opportunity to comment on FSRA's *Loss Trend Benchmarks for Private Passenger Automobile Major Rate Filings* consultation. Please do not hesitate to contact me if you have any questions.

Sincerely,



Kim Donaldson  
Vice President, Ontario

Attachments



Ontario Private Passenger (excl. Farmers) Forward Loss Cost Trends based on Projected Ultimates including ALAE and ULAE from GISA Loss Development Exhibit Data as of 31/12/2019											
Coverage or Sub-Coverage	Forward Loss Cost L+A+U Trend		RRM R <sup>2</sup> Coefficient	Loss Cost ~ 2017-1 Level Change		RRM 2021 Earned Exposure	Policy Year Projected Loss Cost L+A+U		per Car	per TPL-BI Car	
	OW	RRM		OW**	RRM**		per Car	per TPL-BI Car			
Third Party Liability - Bodily Injury Total (Kol 03,04,05,06,07)	-7.50%	-4.49%	94.3%		-8.5%	8,156,041	\$200.59	\$200.59			
Third Party Liability - Property Damage (Kol 15)	4.20%	4.28%	86.1%			8,156,041	\$11.52	\$11.52			
Third Party Liability - Direct Compensation Property Damage (Kol 12,14*,16,17*,18*,19*)	9.20%	8.53%	95.6%			8,156,041	\$304.02	\$304.02			
<b>Approximate Third Party Liability - Total (BI + PD + DCPD)</b>	<b>2.09%</b>	<b>2.98%</b>		<b>0.0%</b>	<b>-4.8%</b>	8,156,041	\$516.13	\$516.13			
Accident Benefits - Funeral (Kol 40,60*)	0.00%	-1.35%	94.7%			8,156,041	\$0.42	\$0.42			
Accident Benefits - Death Benefits (Kol 42,62*)	0.00%	-1.22%	93.0%			8,156,041	\$1.40	\$1.40			
Accident Benefits - Medical/Rehab/AC Total (Kol 41,61*,83*,93*,84*,94*,85*,95*,86*,96*,45*,65*,43*,63*,46*,66*,49*,87*,69*,97*)	<b>0.20%</b>	<b>-0.95%</b>	95.4%	-22.2%	-18.1%	8,156,041	\$247.11	\$247.11			
Accident Benefits - Disability Income Total (Kol 44,80,64*,90*,81,91*,82,92*,48,68*)	<b>-0.40%</b>	<b>3.34%</b>	85.7%	-13.1%	-16.6%	8,156,041	\$81.17	\$81.17			
Accident Benefits - Supplementary Benefits (Kol 37)	0.00%	0.00%	11.3%			8,156,041	\$0.01	\$0.01			
Approximate Accident Benefits - Total (FB + DB + M/R/AC + DI + SB)	0.00%	<b>0.07%</b>		<b>-20.2%</b>	<b>-17.7%</b>	8,156,041	\$330.11	\$330.11			
Uninsured Motorist Total (Kol 36*,38)	-7.00%	-3.03%	53.8%			8,156,041	\$8.58	\$8.58			
<b>Approximate Total Compulsory Coverages</b>	<b>1.17%</b>	<b>1.78%</b>		<b>-9.1%</b>	<b>-10.6%</b>					<b>\$854.82</b>	
Underinsured Motorist - All (Cov 0x)	<b>1.10%</b>	3.74%	31.7%			7,925,512	\$8.71	\$8.46			
Collision - Total (Cov 3x)	<b>9.10%</b>	<b>12.38%</b>	92.2%			5,497,951	\$376.01	\$253.47			
All Perils - Total (Cov 4x)	<b>8.90%</b>	<b>7.96%</b>	91.2%			1,909,669	\$493.17	\$115.47			
Comprehensive - Theft (Cov 8x & Kol 22,23,24)		36.14%	97.4%			5,739,438	\$67.20	\$47.29			
Comprehensive - Other (Cov 8x & Kol 21,25,26,27,28,29)		9.59%	76.1%			5,739,438	\$80.95	\$56.96			
<b>Approximate Comprehensive - Total (Cov 8x)</b>	<b>6.40%</b>	<b>20.22%</b>		<b>0.0%</b>	<b>0.0%</b>	5,739,438	\$148.15	\$104.25			
Specified Perils - Total (Cov 2x)	6.40%	1.01%	51.8%			2,297	\$22.82	\$0.01			
<b>Approximate Total Optional Coverages</b>	<b>8.35%</b>	<b>12.70%</b>		<b>0.0%</b>	<b>0.0%</b>					<b>\$481.66</b>	
<b>Approximate Total All Covers</b>	<b>3.59%</b>	<b>5.46%</b>		<b>-7.0%</b>	<b>-8.1%</b>					<b>\$1,336.48</b>	
* Kinds of Loss with an asterisk have had their claim count suppressed											
** OW's effective date for the ~ 2017-1 Level Change is 01/06/2016, versus RRM's 01/01/2017											
	GISA 31/12/2019 PPAXF Actual Loss Ratio Exhibit - Total All Coverages										
	AY	WE	EE	WP	EP	IN	LC	Avg. EP	Avg. LC	LR	
	2015	7,202,468	7,091,954	\$10,479,888,396	\$10,380,061,791	669,597	\$7,739,880,565	\$1,463.64	\$1,091.36	74.6%	
	2016	7,535,689	7,283,803	\$10,791,388,549	\$10,506,327,190	707,960	\$8,227,639,251	\$1,442.42	\$1,129.58	78.3%	
	2017	7,587,009	7,478,131	\$10,937,659,174	\$10,709,338,713	730,047	\$8,229,850,662	\$1,432.09	\$1,100.52	76.8%	
	2018	7,767,958	7,664,489	\$11,664,177,866	\$11,237,724,057	770,489	\$8,677,744,499	\$1,466.21	\$1,132.20	77.2%	
	2019	7,900,933	7,833,529	\$12,913,377,604	\$12,263,782,091	788,898	\$8,987,289,113	\$1,565.55	\$1,147.28	73.3%	
	Total	37,994,057	37,351,906	\$56,786,491,589	\$55,097,233,842	3,666,991	\$41,862,404,090	\$1,475.08	\$1,120.76	76.0%	

**Comments re Forward Loss Cost Trend Rates:**

RRM's trend models (including fitted forward loss cost trends) are intended for use in estimating 2021 Policy Year loss costs, under the assumption that there will be no lingering effects of COVID-19 on loss costs - they may not be appropriate for the estimation of loss costs for earlier periods, or for that matter, for the 2021 Policy Year to the extent that this assumption proves to be false

No ad hoc changes in level or trend due to the 10/2018 legalization of cannabis or due to the 2020 COVID-19 Pandemic (for which there is not yet any data available from GISA which could be affected) have been included in the RRM trend models (or, it appears, also in the OW trend selections) - in particular, the 2020 COVID-19 Pandemic might have a material effect on claim costs in the short term for periods after 2019-2, to reflect the impact of possible effects such as reduced vehicle use, increased fraud, or altered claims administration, which may be occurring and might persist and affect claim costs into PY 2021

OW's forward appear not to be coupled with any recent level changes, except for AB-M/R/AC

Only (sub-)coverages with material Loss Costs matter: TPL-BI, TPL-DCPD, AB and its sub-coverages AB-M/R/AC and AB-DI, Collision, All Perils, Comprehensive

OW's forward loss trends = past trends (except for TPL-BI pre 01/04/2016, DCPD pre 2013, and AB pre 01/06/2016), while RRM's forward trends = past trends from 2017-1 for TPL-BI, AB-M/R/AC, Collision and Comprehensive, and from 2010-1 or earlier for other (sub-)coverages

Amongst the significant (sub-)coverages, and totals, OW versus RRM short term forward loss cost trends differ perhaps materially as follows:

- **TPL-BI:** both OW and RRM have material negative trends, with RRM about 3 percentage points above OW, but RRM also has a negative level change at 2017-1 while OW does not - *the recent TPL-BI data is fraught with issues related to recent changes in reporting patterns by a number of major writers, which makes estimated ultimate loss costs for recent periods even more uncertain than usual - in the fullness of time the true ultimate loss costs for recent periods may prove to be materially different from current estimates, and the currently estimated short term forward trends here may prove to be inaccurate, possibly materially*

- **TPL Total:** RRM is about 1 percentage above OW

- **AB M/R/AC:** RRM is about 1 percentage point below OW

- **AB DI:** RRM is about 3.75 percentage above OW

- **Collision:** RRM is about 3.25 percentage points above OW

- **All Perils:** RRM is about 1 percentage point below OW

**Comprehensive - Total:** RRM is about 14 percentage points above OW - RRM analyses the coverage split between Theft and Other, while OW only looks at the total coverage - projected ultimate loss costs for Theft for recent periods starting about 2017-1 are showing consistently very large increases over the value 12 months earlier - *unless the recent Theft data is fraught with unidentified recent reporting issues by major writers (which might change RRM's model), or something has happened very recently in the insurance environment to curb these forward trends, RRM expects extremely large and escalating short term forward loss costs*

- **Total Optional:** RRM is about 4.25 percentage points above OW - this is mainly due to the difference in Collision and Comprehensive

- **Total All Coverages:** RRM is about 1.75 percentage points above OW - due to a combination of the issues discussed above





Ontario Private Passenger Automobile (excluding Farmers)

Valuation Date: 20191231
Data Basis: Direct All-Industry Calendar/Accident Year Data (incl. Facility Association)
Coverage/KoL: Third Party Liability - Property Damage (KoL 15)
Data Source: GISA All-Industry Loss Development Exhibit
Item: Projected Total Industry Experience for the Policy Year starting 01/01/2021
Historical Estimated and Future Projected All-Industry Ultimate Accident Half-Year Experience (excluding Health Levy but including ALAE & ULAE)

Table with columns: Year, Acc. Half Year, Car-Years of Exposure, Estimated Pro Rate, Ultimate Claim #, Ultimate Claim Amount, Statistics # of Claims, % of Total, Estimated Frequency, Estimated Severity, Projected Frequency, Projected Severity, Fitted Regression Statistics, Cost, Premium Ratio, Loss Ratio, \$/Car Loss, \$/Car Claim, Independent Variables for Regression (03-2P, 10-2P, 17-1E, 19-1E), Wch, Old/P, 03-2P/Prior, 10-2P/Prior, 17-1E/Prior, 19-1E/Prior, 2nd HLE Yr Level, Wch, Old/P, 03-2P/Prior, 10-2P/Prior, 17-1E/Prior, 19-1E/Prior

Earned Car-Years of Exposure Beta Hat Parameter Estimates: 14.825 -0.027 -0.031 N/A N/A 0.023 N/A 0.020 N/A N/A N/A
Ultimate Claim Frequency Beta Hat Parameter Estimates: -1.806 N/A N/A N/A N/A 0.025 N/A N/A -0.017 -0.007 N/A
Ultimate Claim Severity Beta Hat Parameter Estimates: 8.257 N/A N/A N/A N/A 0.041 N/A N/A 0.030 0.036 N/A
Ultimate Claim Cost/Car-Year Beta Hat Parameter Estimates: 1.845 N/A N/A N/A N/A 0.066 N/A N/A 0.013 0.029 N/A

Earned Car-Years of Exposure R^2 Statistic = 99.1%; T-Test Statistics on 35 Degrees of Freedom: 3,500.477 -4.277 -4.218 N/A N/A 7.204 N/A 26.322 N/A N/A N/A
Ultimate Claim Frequency R^2 Statistic = 77.3%; T-Test Statistics on 36 Degrees of Freedom: -86.984 N/A N/A N/A N/A 1.271 N/A N/A -3.839 -0.912 N/A
Ultimate Claim Severity R^2 Statistic = 94.3%; T-Test Statistics on 36 Degrees of Freedom: 369.068 N/A N/A N/A N/A 1.915 N/A N/A 6.322 4.196 N/A
Ultimate Claim Cost/Car-Year R^2 Statistic = 86.1%; T-Test Statistics on 36 Degrees of Freedom: 84.898 N/A N/A N/A N/A 3.185 N/A N/A 2.839 3.448 N/A

Earned Car-Years of Exposure Two-Sided T-Test Tail Probability %: 0.000 0.014 0.017 N/A N/A 0.000 N/A 0.000 N/A N/A N/A
Ultimate Claim Frequency Two-Sided T-Test Tail Probability %: 0.000 N/A N/A N/A N/A 21.186 N/A N/A 0.048 36.778 N/A
Ultimate Claim Severity Two-Sided T-Test Tail Probability %: 0.000 N/A N/A N/A N/A 6.348 N/A N/A 0.000 0.017 N/A
Ultimate Claim Cost/Car-Year Two-Sided T-Test Tail Probability %: 0.000 N/A N/A N/A N/A 0.299 N/A N/A 0.739 0.146 N/A

Earned Car-Years of Exposure Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 2,744,528.627 0.973 0.970 1.000 1.000 1.023 1.000 1.020 1.020 1.020 1.020
Ultimate Claim Frequency Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 0.164 1.000 1.000 1.000 1.000 1.026 1.000 1.000 0.983 0.976 0.976
Ultimate Claim Severity Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 3,852.933 1.000 1.000 1.000 1.000 1.042 1.000 1.000 1.031 1.068 1.068
Ultimate Claim Cost/Car-Year Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 6.331 1.000 1.000 1.000 1.000 1.068 1.000 1.000 1.013 1.043 1.043

Note: 1. Earned Exposure, Frequency, Severity, and Loss Cost are projected by Linear Regression on their Natural Logarithms
2. Regression Equation is: ln Y = X x Beta + Epsilon, where X is matrix of independent variables, and Epsilon is distributed Normal (0, I x Sigma\*2)
3. Independent Variables with Beta Hat and T Statistic and T Tail Probability = N/A have been judgmentally omitted from the Regression



Ontario Private Passenger Automobile (excluding Farmers)

Valuation Date: 30191231
Data Basis: Direct All-Industry Calendar/Accident Year Data (incl. Facility Association)
Coverage/Kol: Accident Benefits - Funeral (Kol 40,60\*)
Data Source: GISA All-Industry Loss Development Exhibit
Description: Historical Estimated and Future Projected All-Industry Ultimate Accident Half-Year Experience (excluding Health Levy but including ALAE & ULAE)

Table with 26 columns: Acc. Half Year, Car-Years Exposure, Estimated Car-Rate Earned, Ultimate Pro Rata Claim Count, Statistics # Claim, \$ Earned, Future \$ Claim, Projected \$ Claim, Ultimate \$ Claim, Fitted Regression Statistics \$/Car Loss Cost, % Car Loss Ratio, % Car Loss Ratio, Fitted Regression Estimates \$/Car Loss Cost, OldP/Loss Cost, Independent Variables for Regression (03-2P/Prior Level, 10-2P/Prior Level, 17-1E/Prior Level, 19-1E/Prior Level, 17-1E/Outlier, 2nd HLF Yr Level), WchR/CAT Level, OldP/Prior Trend, 03-2P/Prior Trend, 10-2P/Prior Trend, 17-1E/Prior Trend.

Summary statistics for Beta Hat Parameter Estimates: Earned Car-Years of Exposure, Ultimate Claim Frequency, Ultimate Claim Severity, Ultimate Claim Cost/Car-Year.

Summary statistics for R2 Statistic and T-Test Statistics on 35 and 36 Degrees of Freedom for various metrics.

Summary statistics for Two-Sided T-Test Tail Probability % for various metrics.

Summary statistics for Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend, for various metrics.

Note: 1. Earned Exposure, Frequency, Severity, and Loss Cost are projected by Linear Regression on their Natural Logarithms
2. Regression Equation is: Ln Y = X x Beta + Epsilon, where X is matrix of independent variables, and Epsilon is distributed Normal (0, I x Sigma\*2)
3. Independent Variables with Beta Hat and T Statistic and T Tail Probability = N/A have been judgmentally omitted from the Regression

Ontario Private Passenger Automobile (excluding Farmers)

Valuation Date: 30191231
Data Basis: Direct All-Industry Calendar/Accident Year Data (incl. Facility Association)
Coverage/Kol: Accident Benefits - Death Benefits (Kol 42,62\*)
Data Source: GISA All-Industry Loss Development Exhibit
Description: Projected Total Industry Experience for the Policy Year starting 01/01/2021
Historical Description: Historical Estimated and Future Projected All-Industry Ultimate Accident Half-Year Experience (excluding Health Levy but including ALAE & ULAE)

Table with columns: Acc. Half Year, Car-Exposure, Estimated Pro Rate, Ultimate Claim #, Statistics #, Fitted Regression, and Independent Variables for Regression (OldP, 03-2P, 10-2P, 17-1E, 19-1E, 2nd HLF Yr, Wch, OldP, 03-2P, 10-2P, 17-1E). Rows include years from 20001 to 20222 and a PWTd row.

Summary table for Beta Hat Parameter Estimates. Columns: Parameter Name, Value, and various trend indicators (e.g., 14.804, -0.009, -0.033).

Summary table for R\*2 Statistic and T-Test Statistics. Columns: Parameter Name, Value, and various trend indicators (e.g., 2,983.295, -1.228, -3.841).

Summary table for Two-Sided T-Test Tail Probability. Columns: Parameter Name, Value, and various trend indicators (e.g., 0.000, 22.761, 0.049).

Summary table for Exponentiated Beta Hat Parameter Estimates. Columns: Parameter Name, Value, and various trend indicators (e.g., 2,686,641.850, 0.991, 0.968).

Note: 1. Earned Exposure, Frequency, Severity, and Loss Cost are projected by Linear Regression on their Natural Logarithms
2. Regression Equation is: Ln Y = X x Beta + Epsilon, where X is matrix of independent variables, and Epsilon is distributed Normal (0, I x Sigma\*2)
3. Independent Variables with Beta Hat and T Statistic and T Tail Probability = N/A have been judgmentally omitted from the Regression

Ontario Private Passenger Automobile (excluding Farmers)

Valuation Date: 20191231
Data Basis: Direct All-Industry Calendar/Accident Year Data (incl. Facility Association)
Coverage/Kol: Accident Benefits - Medical/Rehabilitation/Attendant Care Total (Kol 41,61\*,83\*,93\*,84\*,94\*,85\*,95\*,86\*,96\*,45\*,65\*,43\*,63\*,46\*,66\*,49\*,87\*,69\*,97\*)
Data Source: GISA All-Industry Loss Development Exhibit
Item: Projected Total Industry Experience for the Policy Year starting 01/01/2021
Description: Historical Estimated and Future Projected All-Industry Ultimate Accident Half-Year Experience (excluding Health Levy but including ALAE & ULAE)

Table with columns: Acc. Year, Car-Year, Half Year, Exposure, Estimated Car-Rate, Ultimate Car-Rate, Statistics #, \$, \$/Car, Future Claim, \$/Car, Loss, Fitted Regression, Independent Variables, etc. Rows include years 2000-2022 and FYWtd 8,199,489.

Earned Car-Years of Exposure Beta Hat Parameter Estimates: 14.804 -0.009 -0.033 N/A N/A 0.022 N/A 0.021 N/A N/A N/A

Earned Car-Years of Exposure R\*2 Statistic = 98.9%; T-Test Statistics on 35 Degrees of Freedom: 2,983.295 -1.228 -3.841 N/A N/A 5.927 N/A 22.936 N/A N/A N/A

Earned Car-Years of Exposure Two-Sided T-Test Tail Probability %: 0.000 22.761 0.049 N/A N/A 0.000 N/A 0.000 N/A 0.000 N/A

Earned Car-Years of Exposure Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 2,686,641.850 0.991 0.968 1.000 1.000 1.023 1.000 1.021 1.021 1.021

Note: 1. Earned Exposure, Frequency, Severity, and Loss Cost are projected by Linear Regression on their Natural Logarithms
2. Regression Equation is: Ln Y = X x Beta + Epsilon, where X is matrix of independent variables, and Epsilon is distributed Normal (0, I x Sigma\*2)
3. Independent Variables with Beta Hat and T Statistic and T Tail Probability = N/A have been judgmentally omitted from the Regression





Ontario Private Passenger Automobile (excluding Farmers)

Valuation Date: 30191231
Data Basis: Direct All-Industry Calendar/Accident Year Data (incl. Facility Association)
Coverage/Kol: Accident Benefits - Supplementary Benefits (Kol 37)
Data Source: GISA All-Industry Loss Development Exhibit
Description: Projected Total Industry Experience for the Policy Year starting 01/01/2021
Historical Description and Future Projected All-Industry Ultimate Accident Half-Year Experience (excluding Health Levy but including ALAE & ULAE)

Table with columns: Historical Year, Estimated Car-Years, Ultimate Pro Rata, Statistics # Claim, \$ Earned, \$ Claim, % Claim, Fitted Regression Estimates, Independent Variables for Regression (OldP, 03-2P, 10-2P, 17-1E, 19-1E, 2nd HLF Yr, Level, Wch, OldP, 03-2P, 10-2P, 17-1E, 19-1E, Prior, Trend).

Earned Car-Years of Exposure Beta Hat Parameter Estimates: 14.804 -0.009 -0.033 N/A N/A 0.022 N/A 0.021 N/A N/A N/A
Ultimate Claim Frequency Beta Hat Parameter Estimates: -9.768 N/A N/A N/A N/A 0.668 N/A N/A N/A N/A N/A
Ultimate Claim Severity Beta Hat Parameter Estimates: 9.002 N/A N/A N/A N/A 0.892 N/A N/A N/A N/A N/A
Ultimate Claim Cost/Car-Year Beta Hat Parameter Estimates: -5.371 N/A N/A N/A N/A 1.561 N/A N/A N/A N/A N/A

Earned Car-Years of Exposure R^2 Statistic = 98.9%; T-Test Statistics on 35 Degrees of Freedom: 2,983.295 -1.228 -3.841 N/A N/A 5.927 N/A 22.936 N/A N/A N/A
Ultimate Claim Frequency R^2 Statistic = 21.4%; T-Test Statistics on 38 Degrees of Freedom: -66.544 N/A N/A N/A N/A 3.218 N/A N/A N/A N/A N/A
Ultimate Claim Severity R^2 Statistic = 5.0%; T-Test Statistics on 38 Degrees of Freedom: 20.223 N/A N/A N/A N/A 1.418 N/A N/A N/A N/A N/A
Ultimate Claim Cost/Car-Year R^2 Statistic = 11.3%; T-Test Statistics on 38 Degrees of Freedom: -10.720 N/A N/A N/A N/A 2.202 N/A N/A N/A N/A N/A

Earned Car-Years of Exposure Two-Sided T-Test Tail Probability %: 0.000 22.761 0.049 N/A N/A 0.000 N/A 0.000 N/A N/A N/A
Ultimate Claim Frequency Two-Sided T-Test Tail Probability %: 0.000 N/A N/A N/A N/A 0.264 N/A N/A N/A N/A N/A
Ultimate Claim Severity Two-Sided T-Test Tail Probability %: 0.000 N/A N/A N/A N/A 16.445 N/A N/A N/A N/A N/A
Ultimate Claim Cost/Car-Year Two-Sided T-Test Tail Probability %: 0.000 N/A N/A N/A N/A 3.378 N/A N/A N/A N/A N/A

Earned Car-Years of Exposure Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 2,686,641.850 0.991 0.968 1.000 1.000 1.023 1.000 1.021 1.021 1.021 1.021
Ultimate Claim Frequency Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 0.000 1.000 1.000 1.000 1.000 1.951 1.000 1.000 1.000 1.000 1.000
Ultimate Claim Severity Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 8,120.244 1.000 1.000 1.000 1.000 2.441 1.000 1.000 1.000 1.000 1.000
Ultimate Claim Cost/Car-Year Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 0.005 1.000 1.000 1.000 1.000 4.762 1.000 1.000 1.000 1.000 1.000

Note: 1. Earned Exposure, Frequency, Severity, and Loss Cost are projected by Linear Regression on their Natural Logarithms
2. Regression Equation is: Ln Y = X x Beta + Epsilon, where X is matrix of independent variables, and Epsilon is distributed Normal (0, I x Sigma\*2)
3. Independent Variables with Beta Hat and T Statistic and T Tail Probability = N/A have been judgmentally omitted from the Regression

Ontario Private Passenger Automobile (excluding Farmers)

Valuation Date: 30191231
Data Basis: Direct All-Industry Calendar/Accident Year Data (incl. Facility Association)
Coverage/Kol: Uninsured Motorist - Total (Kol 36\*,38)
Data Source: GISA All-Industry Loss Development Exhibit
Description: Projected Total Industry Experience for the Policy Year starting 01/01/2021
Historical Estimated and Future Projected All-Industry Ultimate Accident Half-Year Experience (excluding Health Levy but including ALAE & ULAE)

Table with columns: Historical Acc. Half Year Exposure, Estimated Pro Rate Earned, Ultimate Claim Count, Statistics # Claim, % Claim, \$ Amount, \$/Car, \$/Car Loss, % Car-Loss, Fitted Regression Claim, % Claim, \$/Car, \$/Car Loss, % Car-Loss, Independent Variables for Regression (03-2P, 10-2P, 17-1E, 19-1E, 2nd HLF Yr, 2nd CAT, Wch, OldP, 03-2P, 10-2P, 17-1E, 19-1E, 10-2P, 17-1E, 19-1E, 17-1E, 19-1E, 17-1E, 19-1E, 17-1E, 19-1E).

Earned Car-Years of Exposure Beta Hat Parameter Estimates: 14.819 -0.022 -0.030 N/A N/A 0.023 N/A 0.020 N/A N/A N/A
Ultimate Claim Frequency Beta Hat Parameter Estimates: -3.644 N/A N/A N/A N/A 0.060 N/A 0.133 -0.192 N/A N/A
Ultimate Claim Severity Beta Hat Parameter Estimates: 10.108 N/A N/A N/A N/A 0.070 N/A 0.076 -0.048 N/A N/A
Ultimate Claim Cost/Car-Year Beta Hat Parameter Estimates: 1.859 N/A N/A N/A N/A 0.130 N/A 0.209 -0.240 N/A N/A

Earned Car-Years of Exposure R\*2 Statistic = 99.4%; T-Test Statistics on 35 Degrees of Freedom: 4,213.658 -4.180 -4.913 N/A N/A 8.767 N/A 31.628 N/A N/A N/A
Ultimate Claim Frequency R\*2 Statistic = 93.9%; T-Test Statistics on 36 Degrees of Freedom: -74.388 N/A N/A N/A N/A 2.579 N/A 8.510 -11.275 N/A N/A
Ultimate Claim Severity R\*2 Statistic = 52.3%; T-Test Statistics on 36 Degrees of Freedom: 75.977 N/A N/A N/A N/A 1.105 N/A 1.802 -1.030 N/A N/A
Ultimate Claim Cost/Car-Year R\*2 Statistic = 53.8%; T-Test Statistics on 36 Degrees of Freedom: 15.507 N/A N/A N/A N/A 2.280 N/A 5.478 -5.752 N/A N/A

Earned Car-Years of Exposure Two-Sided T-Test Tail Probability %: 0.000 0.019 0.002 N/A N/A 0.000 N/A 0.000 N/A N/A N/A
Ultimate Claim Frequency Two-Sided T-Test Tail Probability %: 0.000 N/A N/A N/A N/A 1.414 N/A 0.000 0.000 N/A N/A
Ultimate Claim Severity Two-Sided T-Test Tail Probability %: 0.000 N/A N/A N/A N/A 27.669 N/A 7.997 30.967 N/A N/A
Ultimate Claim Cost/Car-Year Two-Sided T-Test Tail Probability %: 0.000 N/A N/A N/A N/A 2.864 N/A 0.000 0.000 N/A N/A

Earned Car-Years of Exposure Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 2,728,035.560 0.978 0.971 1.000 1.000 1.024 1.000 1.020 1.020 1.020 1.020
Ultimate Claim Frequency Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 0.026 1.000 1.000 1.000 1.000 1.062 1.000 1.142 0.942 0.942 0.942
Ultimate Claim Severity Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 24,529.433 1.000 1.000 1.000 1.000 1.072 1.000 1.079 1.029 1.029 1.029
Ultimate Claim Cost/Car-Year Exponentiated Beta Hat Parameter Estimates, with Cumulative Trend: 6.415 1.000 1.000 1.000 1.000 1.139 1.000 1.233 0.970 0.970 0.970

Note: 1. Earned Exposure, Frequency, Severity, and Loss Cost are projected by Linear Regression on their Natural Logarithms
2. Regression Equation is: Ln Y = X x Beta + Epsilon, where X is matrix of independent variables, and Epsilon is distributed Normal (0, I x Sigma\*2)
3. Independent Variables with Beta Hat and T Statistic and T Tail Probability = N/A have been judgmentally omitted from the Regression

Ontario Private Passenger Automobile (excluding Farmers)

Valuation Date: 20191231
Data Basis: Direct All-Industry Calendar/Accident Year Data (incl. Facility Association)
Coverage/Kol: Underinsured Motorist - Total (Cov 0x)
Data Source: GISA All-Industry Loss Development Exhibit
Item: Projected Total Industry Experience For the Policy Year starting 01/01/2021
Description: Historical Estimated and Future Projected All-Industry Ultimate Accident Half-Year Experience (excluding Health Levy but including ALAE & ULAE)

Table with columns for Acc. Half Year, Car-Years Exposure, Estimated Pro Rate, Ultimate Claim, Statistics #, Claim Amount, Frequency, and Future Projected Ultimate Statistics, along with Fitted Regression Estimates and Independent Variables for Regression.

Table showing Beta Hat Parameter Estimates for Earned Car-Years of Exposure, Ultimate Claim Frequency, and Ultimate Claim Severity. Columns include parameter estimates and their associated values.

Table showing R^2 Statistic and T-Test Statistics for Earned Car-Years of Exposure, Ultimate Claim Frequency, and Ultimate Claim Severity. Columns include the R^2 statistic, T-test statistic, and degrees of freedom.

Table showing Two-Sided T-Test Tail Probability for Earned Car-Years of Exposure, Ultimate Claim Frequency, and Ultimate Claim Severity. Columns include the tail probability and associated values.

Table showing Exponentiated Beta Hat Parameter Estimates with Cumulative Trend for Earned Car-Years of Exposure, Ultimate Claim Frequency, and Ultimate Claim Severity.

Note: 1. Earned Exposure, Frequency, Severity, and Loss Cost are projected by Linear Regression on their Natural Logarithms
2. Regression Equation is: Ln Y = X x Beta + Epsilon, where X is matrix of independent variables, and Epsilon is distributed Normal (0, I x Sigma^2)
3. Independent Variables with Beta Hat and T Statistic and T Tail Probability = N/A have been judgmentally omitted from the Regression













