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September 14, 2020

The Honorable Kent Sullivan Commissioner of Insurance Texas Department of Insurance 333 Guadalupe Street Tower 1, 13th Floor MC 113-1C Austin, Texas 78701

J'ne Byckovski
Director/Chief Actuary
Property and Casualty Actuarial
Texas Department of Insurance
333 Guadalupe Street
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MC 105-5F
Austin, Texas 78701

Via Email: Jne.Byckovski@tdi.texas.gov

Via Email: pcfilingsintake@tdi.texas.gov

Chiefclerk@tdi.texas.gov

Re: 2020 TAIPA Commercial Auto Rate Filing

Dear Commissioner Sullivan and Ms. Byckovski:

We make this rate filing on behalf of the Texas Automobile Insurance Plan Association (TAIPA) pursuant to Chapter 2151 of the Texas Insurance Code. This filing, provides for commercial automobile rates that are to be charged for insurance written through TAIPA and is subject to approval by the Commissioner of Insurance

This filing is supported by the Explanatory Memorandum and actuarial report prepared by TAIPA's consulting actuary, Michael J. Miller, FCAS, of Epic Consulting, LLC, included herein.

The current commercial auto TAIPA rates were last adjusted and became effective March 1, 2020 pursuant to Commissioner's Order 2019-6138. As set out in Mr. Miller's report, this filing will generate estimated changes by coverage as follows:

Bodily Injury Liability	+5.0%
Personal Damage Liability	+5.0%
Personal Injury Protection	0.0%
Uninsured Motorists - BI	0.0%
<u>Uninsured Motorists – PD</u>	0.0%
Overall average	+4.8%

## Effective Date.

TAIPA requests that rate changes and new approved rates become effective March 1, 2021.

## Procedure Under Insurance Code Chapter 2151, Subchapter E.

None of the proposed average rate changes for each coverage in this filing exceed 105% of the current rate. Accordingly, a hearing is not required as Insurance Code Section 2151.2041 only requires that the Commissioner conduct a hearing under Section 2151.206 in the event TAIPA files a rate "... that exceeds 105 percent of the current average rate for each coverage written through the association on the date of the filing...." This filing is to be considered under Sections 2151.2021 and 2151.2022, as well as the other applicable sections of Subchapter E.

Respectfully submitted,

By: /Michael W. Jones/

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THOMPSON, COE, COUSINS & IRONS, L.L.P. ATTORNEYS FOR TEXAS AUTOMOBILE INSURANCE PLAN ASSOCIATION

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## Attachments:

TDI Transmittal Form PC358 Explanatory Memorandum and Filing Exhibits

cc: Ms. Stacy Dutton, Manager, TAIPA (via email, w/enc.)
Ms. Melissa Hamilton, Office of Public Insurance Council (via email, w/enc.)