

KATHY HOCHUL
Governor



ADRIENNE A. HARRIS
Superintendent

June 30, 2024

Dear Elected Official:

In accordance with the requirements of Section 3425(1)(2) of the New York Insurance Law, please find attached the Department of Financial Services' report on Section 3425 of the Insurance Law regarding private passenger automobile insurance policies.

Respectfully Submitted,

Adrienne A. Harris
Superintendent of Financial Services

cc: Governor Kathy Hochul
Hon. Andrea Stewart-Cousins
Hon. Carl E. Heastie
Hon. Neil D. Breslin
Hon. David I. Weprin
Hon. Robert G. Ort
Hon. William A. Barclay

REPORT ON PRIVATE PASSENGER AUTOMOBILE INSURANCE POLICIES

Pursuant to section 3425(l)(2) of the Insurance Law in
relation to private passenger automobile insurance policies

June 30, 2024



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INTRODUCTION

Section 3425 of the New York Insurance Law sets forth the requirements regarding automobile insurers' decisions to non-renew or conditionally renew private passenger automobile insurance policies upon expiration of the required one-year policy period. This report on such non-renewals or conditional renewals is made pursuant to the requirements of Section 3425(l)(2) of the New York Insurance Law ("Report").

Specifically, Section 3425(f)(1) permits an insurer (with limited exceptions described below) to non-renew or conditionally renew up to a maximum of 2% of the total number of covered policies in force at the end of the previous year in each of an insurer's rating territories. This limitation is commonly referred to as the "2% Rule." Excluded from the 2% Rule are cancellations made within the first 60 days of a newly issued policy, and midterm terminations due to a limited number of reasons prescribed by statute, such as non-payment of premium, fraud in obtaining the policy or in presentation of a claim, and suspension or revocation of a driver's license. Also excluded from the 2% Rule are terminations made at the policyholder's request. In addition, the law permits insurers to annually non-renew one policy in a given rating territory where the total number of policies in such territory is less than 50. The law also permits an insurer to non-renew policies at a rate greater than 2% under certain circumstances and subject to the Superintendent's approval.

Section 3425(f)(2) provides that an insurer may non-renew or conditionally renew one additional policy in each territory beyond the two percent limitation for every two newly issued automobile insurance policies voluntarily written by that insurer in such territory. Section 3425(f)(2), which can be viewed as a companion rule of Section 3425(f)(1), is often referred to as the "2-for-1 Credit."

Section 3425(l)(2) requires the Superintendent to collect, analyze, and compile reports submitted by insurers regarding the number of new insureds, nonrenewed insureds, and business written by each insurer in each of its rating territories, and to report the results of such analysis to the Legislature by June 30, 2020, and to repeat that process every two years thereafter. Chapter 395 of the laws of 2017 amended this section to include this extended reporting period and to also require reporting of the reasons in the aggregate for the non-renewal of policies.

The Department of Financial Services (the "Department") last reported on this subject on June 30, 2022 for the two-year period ended December 31, 2020. Chapter 182 of the Laws of 2023 extended these sections to June 30, 2026. The data analyzed for this Report covers the two-year period ended December 31, 2022, during which time the 2% Rule was continuously in effect.

LEGISLATIVE BACKGROUND OF SECTION 3425

Section 3425 has an extensive history. It was originally enacted in 1969 as Section 167-a to establish minimum policy standards limiting insurers' right to terminate private passenger automobile coverage, while preserving the necessary freedom to underwrite responsibly. As time passed and circumstances changed, Section 3425 evolved both in response to current market conditions and in a manner consistent with the law's original goals.

REPORT METHODOLOGY

Collection of Data

In order to obtain the information for this Report, the Department, pursuant to Section 3425(l) of the Insurance Law, required all insurers with voluntary private passenger automobile insurance policies in force in New York for 2021 and 2022 to submit specific underwriting data for the respective calendar years.

The required report formats and instructions are posted on the Department's web site for access and downloading by all insurers. All reports were required to be completed in a standardized electronic format.

Driver Classifications and Territorial Designations Utilized

Automobile insurance companies price the policies they sell to individuals by means of driver classification systems that, when actuarially and statistically supported and properly applied, help predict future losses and prevent unfair discrimination.

Classification systems may differ among insurance companies. Some use simple systems that include a few separate classes, while others employ more complex systems utilizing many classes and variables. However, the basic principal driver classifications common to virtually all insurers are: Adult; Senior Citizen; Youthful Male; and Youthful Female (all of which are further differentiated by "Business" or "Pleasure" use). For the purpose of evaluating the operation of Section 3425, the Department uses data reported by insurers for the first four classes, since they are most relevant to the objective of the statute, which is protection of personal automobile insurance policyholders.

The geographical garaging location of the vehicle insured determines the rating territory used in calculating the policy premium. Territory definitions vary among insurers. Since the 2% Rule functions on a territorial basis, for the purposes of this Report, it is essential that compliance data be reported in a uniform statewide-compatible format. Therefore, in completing their annual submissions of information required by Section 3425, insurers are instructed to conform their respective territorial reports to a standard set of 70 defined territories.

SCOPE OF ANALYSIS

The compiled data are presented in two parts in the Overall Findings section of this Report. Part I (Summary by Classes) summarizes the number of policies in force, the number of new policies written, and the number of nonrenewed policies, categorized by class of insureds, of the 30 largest auto insurers (by premium volume) in New York State for the years 2021 and 2022.

Based on the direct written premiums reported on the companies' filed annual statements, the top 30 insurers represented the following cumulative market share of all private passenger automobile insurance business written in New York State: 87.24% in 2021 and 87.22% in 2022. Because of the significant aggregate share of the overall insurance market represented by these companies, the summary data for this group represent a reliable measure of the effectiveness of the law.

Part II (Other Information) presents information on excess nonrenewals (i.e., the number of policies nonrenewed above the 2% limit), disciplinary actions, new business written, and consumer complaints for all insurers (including the top 30) writing private passenger automobile insurance in New York.

All the data utilized in compiling this Report were provided by insurers writing private passenger automobile insurance in New York.

The excess nonrenewal data originally reported are subject to verification by the Property Bureau's Market Conduct Unit and may result in disciplinary action for an insurer found in violation. The raw data submitted by companies include information on all activities regarding reduction of policies (policies written, cancelled, nonrenewed or conditionally renewed by company or terminated by insured's request, reasons stated for nonrenewing policies), including any permitted exceptions to the 2% Rule. The Department analyzes this data to determine the number of policies nonrenewed or conditionally renewed in excess of that permitted.

The information reflected in this Report represents the most current data available at the time the Report was prepared.

ANALYSIS

I. SUMMARY BY CLASSES

The following tables summarize the voluntary market data of the 30 largest New York private passenger automobile insurers by various driver classifications:

Table 1		
All Classes Combined		
	2021	2022
Policies In Force	6,026,198	5,976,274
Policies Nonrenewed	40,133	48,037
Percent Nonrenewed	0.67%	0.80%

Comments:

Overall, the industry has consistently stayed within the 2% limitation. The effectiveness of the 2% Rule is reflected in the relatively stable number of policies in force. While the number and percentage of policies in force remained relatively stable from 2021 through 2022, the number and percentage of policies nonrenewed during the two-year period increased.

Table 2		
Senior Citizens		
	2021	2022
Senior Citizens Policies In Force	1,206,255	1,189,938
Senior Citizens Class as a % of all Policies	20.02%	19.91%
Senior Citizens Policies Nonrenewed	4,289	4,660
% Senior Citizens Non-renewed of all Senior Citizens Policies In Force	0.36%	0.39%
% Senior Citizens Non-renewed of all Policies Nonrenewed	10.69%	9.70%
% Senior Citizens Non-renewed of all Policies In Force	0.07%	0.08%

Comments:

During the two-year reporting period, senior citizens represented approximately 19.96% of policyholders. In averaging the two years, this class represented approximately 10.15% of all policyholders nonrenewed.

While an average of 0.73% of all classes combined were nonrenewed during the two-year period covered by this Report, an average of 0.37% of the senior citizens were nonrenewed. The relative nonrenewal rate of senior citizens appears to indicate that this class appears to be considered more desirable by many insurers relative to the overall market. Indeed, a senior citizen is less likely to be nonrenewed than the average policyholder.

Table 3		
Youthful Males		
	2021	2022
Youthful Males Policies In Force	175,507	156,599
Youthful Males Class as a % of all Policies	2.86%	2.62%
Youthful Males Policies Nonrenewed	1,689	1,890
% Youthful Males Non-renewed of all Youthful Males Policies In Force	0.98%	1.21%
% Youthful Males Non-renewed of all Policies Nonrenewed	4.21%	3.93%
% Youthful Males Non-renewed of all Policies In Force	0.03%	0.03%

Comments:

Youthful males have had, historically, more difficulty finding and maintaining coverage in the voluntary market relative to all other age classes. During this two-year period, there was a decrease in the number of youthful male policies in force. The number of youthful male policies nonrenewed increased between 2021 and 2022.

Table 4		
Youthful Females		
	2021	2022
Youthful Females Policies In Force	137,235	125,030
Youthful Females Class as a % of all Policies	2.28%	2.09%
Youthful Females Policies Nonrenewed	1,122	1,178
% Youthful Females Non-renewed of all Youthful Females Policies In Force	0.82%	0.94%
% Youthful Females Non-renewed of all Policies Nonrenewed	2.80%	2.45%
% Youthful Females Non-renewed of all Policies In Force	0.02%	0.02%

Comments:

As a percentage of all youthful female policies, nonrenewals for this class averaged approximately 0.88% in the two-year period covered by this report. Of all policies nonrenewed, the average of youthful females nonrenewed relative to all policies nonrenewed was 2.61% during this two-year period. However, as a percentage of all policies in force, youthful females' rate of nonrenewals is well below the overall average. During this two-year period, there was a decrease in the number of youthful female policies in 2021 and 2022.

General Comments and Observations

Although nonrenewals in the youthful operator classes are well within the permissible statutory limit relative to the overall nonrenewal rate, youthful operators have a greater chance of being nonrenewed than the average policyholder, regardless of gender. Drivers in the youthful operator classes generally experience more difficulties in obtaining insurance as well. Whenever insurers become more selective in their underwriting practices, the most significantly affected are those classes that historically have been least attractive from an underwriter's perspective – namely, youthful operators.

Notably, with respect to youthful operators, those that move back into or continue to reside in their parents' households are generally insured under their parents' policies, and do not need to purchase policies of their own. Additionally, youthful operators are in the segment of the population that is most comfortable with new technology and innovative concepts. The growth of technology and the sharing economy may make it possible for people to

enjoy the benefits of driving without the burdens of car ownership and recurring costs (including direct insurance costs). Senior citizens, too, may be driving less.

II. OTHER INFORMATION

The following information is based on reports filed by all insurers writing private passenger automobile insurance in New York.

A summary of excess nonrenewals by territory throughout the State may be found in Appendix I. Appendix II summarizes excess nonrenewals by companies and groups.

1. Market Conduct Examinations and Disciplinary Actions for Excess Nonrenewals

Insurers report the number of nonrenewals and policies in force annually. The Department monitors insurers' activities with respect to excess nonrenewals. Insurers found to be in violation of the 2% Rule in any given territory are subject to disciplinary action for each policy nonrenewed in excess of the insurer's permissible number in that territory. The Market Conduct Unit of the Department's Property Bureau investigates all such violations and, when appropriate, imposes penalties. Generally, fines are imposed at the maximum amount allowed under the law.

The Market Conduct Unit maintains a record of all 2% Rule violations that have been settled. Fines collected for Section 3425 violations by consent order in the two-year period of 2021-2022 totaled \$585,900.

(It should be noted that this Report reflects excess nonrenewals *reported* during the two-year period and fines *paid* during that period. A consent order acknowledging violations and agreeing to a fine may cover several years' activity and may not necessarily match violations occurring in the year the consent order was executed.)

2. Excess Nonrenewals

By Territory

An analysis of excess nonrenewals by territory for the two-year period of 2021-2022 indicates that the ten territories with the largest number of excess nonrenewals (out of 70 territories in total) account for 80.99% of all excess nonrenewals. The top 10 territories with excess nonrenewals are in metropolitan and suburban areas.

Detailed information on excess nonrenewals by territory is presented in Appendix I.

By Company/Groups

During the two-year period covered by this Report, a total of 513 policies were nonrenewed in excess of the 2% limitation (other than those terminated under approved withdrawal plans in accordance with Section 3425(r)). The Department continues to monitor and investigate insurers' compliance with the 2% Rule.

Detailed information on excess nonrenewals by company/group is presented in Appendix II.

3. Reasons for Nonrenewal of Policies

Pursuant to the requirements of Chapter 395 of the Laws of 2017, preliminary data was collected to establish a uniform reporting matrix to enable reporting of aggregate reasons for the non-renewal of personal automobile policies. Since policies are often non-renewed for multiple reasons, companies were asked to report each reason separately for the applicable category of nonrenewal.

Based on the analysis of the various reasons stated in notices of nonrenewal issued pursuant to §3425(d)(1), the 20 most frequently used reasons stated by companies for the two-year period covered by this Report fall into the following categories, separately for each year:

	REASON FOR NON-RENEWAL	2021
1	Multiple accidents	34018
2	Conviction(s) - other than specified above	16269
3	Suspended or revoked driver's license	9720
4	Combination of losses & other incidents (not included in categories above)	4599
5	Single accident	2788
6	Failure to comply with terms of policy, provide requested information, or cooperate with claims investigation	2522
7	Failure to provide requested underwriting information (on specified driver, spouse, partner, other listed person, etc.)	2478
8	Unlicensed operator involved in accident	1082
9	Agent no longer represents company	1035
10	Issue with driver's license information (insured does not have or failed to obtain valid driver's license, insurer unable to verify driving record information, etc.)	905
11	Insured and/or principal operator moved out of state, does not reside at insured address, or is determined not to have a valid NYS address	829
12	Insured deceased	794
13	Business use of vehicle (unacceptable risk)	694
14	Issue with garaging location of vehicle (not regularly garaged at insured's residence, unable to verify garaging location, garaged outside NYS, etc.)	549
15	Vehicle type not within insurer's underwriting guidelines or eligible to be insured on a private passenger automobile policy (based on passenger seating capacity, gross vehicle weight, etc.)	523
16	Conviction - Driving While Intoxicated or Impaired	486
17	Issue with registration or title of vehicle (insured not named, no insurable interest in vehicle, etc.)	464
18	Conviction - Illegal use of cell/mobile phone (texting, etc.)	451
19	Undisclosed operator (in household, or has regular access to the vehicle)	426
20	Other	865

	REASON FOR NON-RENEWAL	2022
1	Multiple accidents	36945
2	Combination of losses & other incidents (not included in categories above)	6540
3	Single accident	4589
4	Suspended or revoked driver's license	3664
5	Conviction(s) - other than specified above	3572
6	Failure to provide requested underwriting information (on specified driver, spouse, partner, other listed person, etc.)	2308
7	Failure to comply with terms of policy, provide requested information, or cooperate with claims investigation	1905
8	Undisclosed operator (in household, or has regular access to the vehicle)	1883
9	Agent no longer represents company	1528
10	Issue with driver license information (insured does not have or failed to obtain valid driver's license, insurer unable to verify driving record information, etc.)	1296
11	Insured and/or principal operator moved out of state, does not reside at insured address, or is determined not to have a valid NYS address	896
12	Insured deceased	720
13	Business use of vehicle (unacceptable risk)	706
14	Conviction - Driving While Intoxicated or Impaired	640
15	Issue with garaging location of vehicle (not regularly garaged at insured's residence, unable to verify garaging location, garaged outside NYS, etc.)	569
16	Vehicle type not within insurer's underwriting guidelines or eligible to be insured on a private passenger automobile policy (based on passenger seating capacity, gross vehicle weight, etc.)	445
17	Issue with registration or title of vehicle (insured not named, no insurable interest in vehicle, etc.)	441
18	Conviction - Illegal use of cell/mobile phone (texting, etc.)	385
19	Issue with care, custody, and control of vehicle	209
20	Other	753

These numbers do not include non-renewals issued under plans for orderly nonrenewal of policies companies may have had approved under §3425(r).

4. New Business Writings

Private passenger automobile insurers reported new business writings of 1,583,720 policies in 2021, and 1,355,985 policies in 2022.

Private passenger car registrations, as reported by the Department of Motor Vehicles, totaled 9,711,796 in 2021 and 9,527,526 in 2022, which indicates a stable trend in overall registrations. Those holding driver's licenses in New York increased from 11,035,869 in 2021 to 11,176,449 in 2022. We view the foregoing as indicative of a stable market.

5. Consumer Complaints

During the two-year reporting period, a total of 7,197 (3,309 for 2021 and 3,888 for 2022) consumer complaints regarding private passenger automobile insurance were processed by the Department's Consumer Assistance Unit. Of such complaints, 547 (235 in 2021 and 312 in 2022) involved cancellations and nonrenewals of private passenger automobile insurance policies. A total of 23 of those complaints (13 in 2021 and 10 in 2022) were upheld.

Year	Received	Cancelled / Nonrenewed	Upheld
2021	3,309	235	13
2022	3,888	312	10
TOTALS	7,197	547	23

6. Use of Multi-Tier Rating Programs

Chapter 9 of the Laws of 1995 added Section 2349 to the Insurance Law, effective May 28, 1995, to permit multi-tier rating programs.

Under a multi-tier rating program, an insurer may place insureds into different rate levels based on specific factors of risk exposure and driving history. Among the Legislature's objectives in enacting the multi-tier law was the depopulation of the NYAIP (the assigned risk plan). The ability to more closely match risk exposure to an appropriate rate helps more drivers to locate insurers willing to accept them in the voluntary market, provided the rates are not unfairly discriminatory. Evidence indicates that the law has been successful, since the share of the market attributable to the NYAIP is now less than 1%, as compared with 17% in 1993.

Multi-tier programs should have the effect of making insureds who might otherwise not qualify for coverage under insurers' standard underwriting guidelines more attractive when placed in a rating tier that is more appropriate to the driver's risk profile. It was anticipated that this measure would not only increase voluntary writings but would also reduce

nonrenewals as well. Based on the significant depopulation of the assigned risk plan over the last two decades, it appears that the multi-tier statute has thus far accomplished the Legislature's objective.

Pursuant to Section 2349, insurers may move up to 3% of insureds in each rating territory to higher-rated tiers upon annual policy renewal. This applies in addition to Section 3425's 2% Rule. There is no limitation on moving insureds to lower-rated tiers.

CONCLUSION

Section 3425 is intended to establish an equitable balance among the often-competing forces of policyholders' expectations, insurers' legitimate prerogatives in evaluating and assuming risk, and the realities of New York's private passenger automobile insurance marketplace. It provides the foundation for a reliable and predictable automobile insurance market that promotes stability and protects consumers against arbitrary cancellations or nonrenewals of coverage.

A key element of Section 3425(f) is the 2% Rule, which provides sufficient flexibility to insurers to underwrite risks in a fair and prudent manner. It has encouraged insurers to venture into markets where they have previously had little experience, and to develop market strategies that should enhance the availability and affordability of voluntary personal automobile insurance in New York. The rule is also an essential component in limiting the number of policies issued via the New York Automobile Insurance Plan ("NYAIP"), the assigned risk mechanism for insuring persons who cannot otherwise secure automobile insurance. The data in this Report indicate a slight increase in the number and percentage of policies nonrenewed over the relevant two-year period. However, in the aggregate, the industry remains well within the 2% Rule limitation. Furthermore, although the NYAIP population increased between 2021 and 2022, it was still significantly lower in the period covered by the Report (i.e., the two-year period ended December 31, 2022) than in the period covered by the prior report (i.e., the two-year period ended December 31, 2020).

Pursuant to Section 3425(m), if the 2% Rule is not in effect, policies would become subject to a three-year required policy period and may not be nonrenewed except for limited circumstances. Reversion to the three-year rule may discourage voluntary insurers from writing new business. This was evidenced during a 23-month period (August 2, 2001 - June 26, 2003; addressed in prior reports) when the law expired and the 2% Rule was not in effect. While the number of vehicles registered in the State at that time remained stable, the number of voluntary policies in force decreased. Thus, it appears that the suspension of the 2% Rule had a negative effect on the voluntary market by fostering uncertainty in the marketplace and reducing some flexibility insurers had in underwriting their books of business. In contrast, after the 2% Rule was reinstated, increases were observed in the number of voluntary policies in force. This Report continues to confirm the benefits of the 2% Rule.

The 2% Rule, combined with the 2-for-1 Credit, has a beneficial effect on the voluntary private passenger automobile insurance marketplace. These provisions provide stability and stimulate growth of the voluntary market, thereby broadening availability of vital automobile insurance coverage. They allow insurers substantial flexibility and incentive to accept new risks and discontinue only their most undesirable business, as long as they maintain an active presence in the private passenger automobile market.

Based upon the data analyzed for this Report, industry-wide violations of the 2% Rule, both overall as well as by individual driver classes studied, have not been substantial.

When violations are found, the Department actively pursues and applies disciplinary measures to enforce the law and ensure future compliance with the rule.

Appendix I

Summary of Excess Nonrenewals by Territory 2021-2022

APPENDIX I
SUMMARY OF EXCESS NONRENEWALS BY TERRITORY*
2021-2022

Territory Description	Terr#	2021	2022	Total	%	Rank
HEMPSTEAD	20	68	54	122	14.32%	1
QUEENS SUB.	55	110	6	116	13.62%	2
SUFFOLK CO. WEST	75	91	12	103	12.09%	3
KINGS CO.	17	61	7	68	7.98%	4
SUFFOLK CO. EAST	76	49	15	64	7.51%	5
MANHATTAN	18	48	8	56	6.57%	6
OYSTER BAY	22	44	10	54	6.34%	7
BRONX SUB.	3	40	2	42	4.93%	8
STATEN ISLAND	5	31	2	33	3.87%	9
OSSINING	65	25	7	32	3.76%	10
NORTH HEMPSTEAD	21	23	6	29	3.40%	11
NEW YORK CITY SUB.	97	18	6	24	2.82%	12
MIDDLETOWN	64	14	7	21	2.46%	13
ROCKLAND CO.	68	12	3	15	1.76%	14
BUFFALO	7	0	12	12	1.41%	15
ERIE COUNTY (BAL)	41	0	6	6	0.70%	16
ONTARIO CO., ETC.	51	1	4	5	0.59%	17
UTICA	15	2	2	4	0.47%	18
SYRACUSE	12	3	0	3	0.35%	19
ALBANY	13	0	3	3	0.35%	20
SYRACUSE SUB.	38	0	3	3	0.35%	21
CORNING	40	0	3	3	0.35%	22
DUTCHESS CO. (BAL)	58	1	2	3	0.35%	23
DELAWARE CO., ETC.	61	1	2	3	0.35%	24
CLINTON CO., ETC.	67	3	0	3	0.35%	25
WHITE PLAINS	95	3	0	3	0.35%	26
BUFFALO SEMI-SUB.	8	0	2	2	0.23%	27
NEWBURGH	32	1	1	2	0.23%	28
CORTLAND CO., ETC.	54	0	2	2	0.23%	29
JEFFERSON CO.	74	2	0	2	0.23%	30
SULLIVAN CO. CENTRAL	82	2	0	2	0.23%	31
ONEIDA	86	2	0	2	0.23%	32
BRONX	1	1	0	1	0.12%	33
QUEENS	19	1	0	1	0.12%	34
BINGHAMTON	28	0	1	1	0.12%	35
SARATOGA SPRINGS	30	0	1	1	0.12%	36

*These numbers include 339 policies that were non-renewed in excess of the 2% threshold but not considered violations as they were made in accordance with approved withdrawal plans (244 in 2021; 95 in 2022).

APPENDIX I
SUMMARY OF EXCESS NONRENEWALS BY TERRITORY
2021-2022

Territory Description	Terr #	2021	2022	Total	%	Rank
GLENS FALLS	36	0	1	1	0.12%	37
PUTNAM CO.	46	0	1	1	0.12%	38
COLUMBIA CO., ETC.	59	1	0	1	0.12%	39
HIGHLAND, KINGSTON	62	1	0	1	0.12%	40
SARATOGA CO. SOUTH	71	0	1	1	0.12%	41
MT. VERNON & YONKERS	94	0	1	1	0.12%	42
NIAGARA CO. (BAL)	49	0	0	0	0.00%	43
SCHENECTADY CO.	9	0	0	0	0.00%	44
ROCHESTER	11	0	0	0	0.00%	45
NIAGARA FALLS	14	0	0	0	0.00%	46
SARATOGA SPRINGS SUB.	16	0	0	0	0.00%	47
ROME	24	0	0	0	0.00%	48
AUBURN	25	0	0	0	0.00%	49
ELMIRA	27	0	0	0	0.00%	50
GLOVERSVILLE	29	0	0	0	0.00%	51
CHAUTAUQUA CO.	31	0	0	0	0.00%	52
POUGHKEEPSIE	33	0	0	0	0.00%	53
TROY	34	0	0	0	0.00%	54
AMSTERDAM	35	0	0	0	0.00%	55
OSWEGO	37	0	0	0	0.00%	56
ROCHESTER SUB.	39	0	0	0	0.00%	57
BUFFALO SUB.	42	0	0	0	0.00%	58
NIAGARA FALLS SUB.	43	0	0	0	0.00%	59
BROOME CO. (BAL)	44	0	0	0	0.00%	60
ORLEANS CO.	47	0	0	0	0.00%	61
MONROE CO. (BAL)	48	0	0	0	0.00%	62
FORT PLAIN, HERKIMER	52	0	0	0	0.00%	63
SARATOGA CO. (BAL)	56	0	0	0	0.00%	64
GENESEE CO.	60	0	0	0	0.00%	65
ALBANY CO. (BAL)	72	0	0	0	0.00%	66
RENSSELAER CO. (BAL)	73	0	0	0	0.00%	67
MONTICELLO-LIBERTY	81	0	0	0	0.00%	68
SULLIVAN CO. (BAL)	83	0	0	0	0.00%	69
ALLEGHENY CO., ETC.	84	0	0	0	0.00%	70
STATE TOTALS		659	193	852	100%	

Appendix II

Summary of Excess Nonrenewals by Company/Group 2021-2022

APPENDIX II
SUMMARY OF EXCESS NONRENEWALS BY COMPANY/GROUP*
2021-2022

Company/Group	2021	2022	Total	%	Rank
Stillwater Property & Casualty Insurance Company	370		370	72.12%	
WT Holdings Group	370	0	370	72.12%	1
% of Total for the Year	88.94%	0.00%			
Unitrin Direct Insurance Company	3		3	0.58%	
Kemper Independence Insurance Company		44	44	8.58%	
Unitrin Auto & Home Insurance Company		2	2	0.39%	
Infinity Insurance Company		3	3	0.58%	
Unitrin Preferred Insurance Company		12	12	2.34%	
Unitrin Safeguard Insurance Company		13	13	2.53%	
Kemper Corp. Group	3	74	77	15.01%	2
% of Total for the Year	0.72%	75.51%			
Harleysville Insurance Company	15		15	2.92%	
Nationwide Group	15	0	15	2.92%	3
% of Total for the Year	3.61%	0.00%			
Adirondack Insurance Exchange	9		9	1.75%	
National General Insurance Company	1		1	0.19%	
Allstate Insurance Group	10	0	10	1.95%	4
% of Total for the Year	2.40%	0.00%			
American Modern Home Insurance Company		9	9	1.75%	
Munich Reinsurance Group	0	9	9	1.75%	5
% of Total for the Year	0.00%	9.18%			
Mid Century Insurance Company		4	4	0.78%	
Truck Insurance Exchange	2		2	0.39%	
Economy Premier Assurance Company	2		2	0.39%	
Farmers Insurance Group	4	4	8	1.56%	6
% of Total for the Year	0.96%	4.08%			
American Family Connect Insurance Company	4		4	0.78%	
American Family Connect Property & Casualty Ins. Co.	1		1	0.19%	
American Family Insurance Group	5	0	5	0.97%	7
% of Total for the Year	1.20%	0.00%			

*Only companies/groups with five or more non-renewals in excess of the 2% limitation during the two-year period covered by this Report are detailed in this Appendix; the remaining ten groups with less than five non-renewals in excess of the 2% limitation during the two-year period had a total of 20 such non-renewals.

Appendix III

Private Passenger Automobile Insurance Top 30 Market Share in New York State 2021-2022

**APPENDIX III
PRIVATE PASSENGER AUTOMOBILE INSURANCE
TOP 30 INSURERS BY MARKET SHARE IN NEW YORK STATE
2021-2022**

	NAIC#	2021	Market Share
1	35882	Geico Gen Ins Co	18.24%
2	25178	State Farm Mut Auto Ins Co	11.76%
3	29688	Allstate Fire & Cas Ins Co	8.39%
4	22055	Geico Ind Co	7.60%
5	36447	LM Gen Ins Co	5.19%
6	22063	Government Employees Ins Co	5.06%
7	24260	Progressive Cas Ins Co	3.72%
8	11851	Progressive Advanced Ins Co	3.33%
9	19232	Allstate Ins Co	3.26%
10	38130	Travelers Personal Ins Co	2.54%
11	14834	New York Central Mut Fire Ins Co	2.27%
12	32786	Progressive Specialty Ins Co	1.85%
13	24279	Progressive Max Ins Co	1.70%
14	19704	American States Ins Co	1.23%
15	17230	Allstate Prop & Cas Ins Co	0.98%
16	25968	USAA Cas Ins Co	0.91%
17	23760	Nationwide Gen Ins Co	0.90%
18	25143	State Farm Fire & Cas Co	0.88%
19	23035	Liberty Mut Fire Ins Co	0.85%
20	25941	United Serv Automobile Assn	0.81%
21	18600	USAA Gen Ind Co	0.72%
22	34339	Farmers Grp Prop & Cas Ins Co	0.64%
23	12583	Adirondack Ins Exch	0.63%
24	21253	Garrison Prop & Cas Ins Co	0.61%
25	27998	Travelers Home & Marine Ins Co	0.59%
26	30104	Hartford Underwriters Ins Co	0.56%
27	19976	Amica Mut Ins Co	0.54%
28	26298	Farmers Prop & Cas Ins Co	0.51%
29	26093	Nationwide Affinity Co of Amer	0.48%
30	26263	Erie Ins Co	0.48%

**APPENDIX III
PRIVATE PASSENGER AUTOMOBILE INSURANCE
TOP 30 INSURERS BY MARKET SHARE IN NEW YORK STATE
2021-2022**

	NAIC#	2022	Market Share
1	35882	Geico Gen Ins Co	17.73%
2	25178	State Farm Mut Auto Ins Co	13.46%
3	29688	Allstate Fire & Cas Ins Co	9.08%
4	22055	Geico Ind Co	6.72%
5	22063	Government Employees Ins Co	4.83%
6	36447	LM Gen Ins Co	4.55%
7	24260	Progressive Cas Ins Co	3.55%
8	11851	Progressive Advanced Ins Co	3.34%
9	19232	Allstate Ins Co	3.07%
10	38130	Travelers Personal Ins Co	2.67%
11	14834	New York Central Mut Fire Ins Co	2.43%
12	32786	Progressive Specialty Ins Co	1.75%
13	24279	Progressive Max Ins Co	1.53%
14	19704	American States Ins Co	1.43%
15	25143	State Farm Fire & Cas Co	0.98%
16	25968	USAA Cas Ins Co	0.93%
17	17230	Allstate Prop & Cas Ins Co	0.91%
18	23760	Nationwide Gen Ins Co	0.88%
19	25941	United Serv Automobile Assn	0.80%
20	23035	Liberty Mut Fire Ins Co	0.73%
21	18600	USAA Gen Ind Co	0.69%
22	34339	Farmers Grp Prop & Cas Ins Co	0.63%
23	21253	Garrison Prop & Cas Ins Co	0.60%
24	30104	Hartford Underwriters Ins Co	0.60%
25	26298	Farmers Prop & Cas Ins Co	0.60%
26	12583	Adirondack Ins Exch	0.60%
27	27998	Travelers Home & Marine Ins Co	0.54%
28	25712	Esurance Ins Co	0.54%
29	19070	Standard Fire Ins Co	0.54%
30	19976	Amica Mut Ins Co	0.52%