

State: Kentucky **Filing Company:** Progressive Direct Insurance Company
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: KY Direct 201309
Project Name/Number: /

Filing at a Glance

Company: Progressive Direct Insurance Company
Product Name: KY Direct 201309
State: Kentucky
TOI: 19.0 Personal Auto
Sub-TOI: 19.0001 Private Passenger Auto (PPA)
Filing Type: Rate
Date Submitted: 09/24/2013
SERFF Tr Num: PRGS-129215190
SERFF Status: Closed-Acknowledged
State Tr Num: PRGS-129215190
State Status: Filing Closed
Co Tr Num:

Effective Date: 09/27/2013
Requested (New):
Effective Date: 11/06/2013
Requested (Renewal):
Author(s): KY Filer
Reviewer(s): Sandra Stumbo (primary)
Disposition Date: 10/07/2013
Disposition Status: Acknowledged
Effective Date (New): 09/27/2013
Effective Date (Renewal): 11/06/2013

State Filing Description:
FAD: 10/23/2013

State: Kentucky **Filing Company:** Progressive Direct Insurance Company
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: KY Direct 201309
Project Name/Number: /

General Information

Project Name: Status of Filing in Domicile:
Project Number: Domicile Status Comments:
Reference Organization: Reference Number:
Reference Title: Advisory Org. Circular:
Filing Status Changed: 10/07/2013
State Status Changed: 10/07/2013 Deemer Date: 10/24/2013
Created By: KY Filer Submitted By: KY Filer
Corresponding Filing Tracking Number:

Filing Description:

Subject: File and Use Rate Filing:
Effective Dates: September 27, 2013 – New Business;
November 6, 2013 – Renewal Business

Enclosed you will find updated rates. This filing is being made as a "file and use" filing pursuant to Kentucky Revised Statutes, Title XXV, Chapter 304, Section 304.13-051.

We are enclosing only the rate pages that have changed with this revision. If you have questions regarding this filing, please contact me directly at (804) 887-5789 or by e-mail at Omar_Parvaiz@progressive.com.

Thank you for your timely review of the filing.

Sincerely,

Omar Parvaiz
Product Manager
804-887-5789

Company and Contact

Filing Contact Information

Omar Parvaiz, Product Manager omar_parvaiz@progressive.com
200 Westgate Parkway 804-887-5789 [Phone]
Suite 300 804-360-4531 [FAX]
Richmond, VA 23233

Filing Company Information

Progressive Direct Insurance Company	CoCode: 16322	State of Domicile: Ohio
6300 Wilson Mills Rd	Group Code: 155	Company Type:
Mayfield Village, OH 44143	Group Name: Progressive Grp. of Cos.	State ID Number:
(440) 461-5000 ext. [Phone]	FEIN Number: 34-1524319	

Filing Fees

State: Kentucky **Filing Company:** Progressive Direct Insurance Company
TOI/Sub-TOI: 19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)
Product Name: KY Direct 201309
Project Name/Number: /

Fee Required? Yes
Fee Amount: \$5.00
Retaliatory? Yes
Fee Explanation: 1 Company X \$5 File and Use Filing Fee = \$5
Per Company: Yes

Company	Amount	Date Processed	Transaction #
Progressive Direct Insurance Company	\$5.00	09/24/2013	74428867

SERFF Tracking #:

PRGS-129215190

State Tracking #:

PRGS-129215190

Company Tracking #:

State:

Kentucky

Filing Company:

Progressive Direct Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

KY Direct 201309

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/

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Acknowledged	Sandra Stumbo	10/07/2013	10/07/2013

SERFF Tracking #:

PRGS-129215190

State Tracking #:

PRGS-129215190

Company Tracking #:

State:

Kentucky

Filing Company:

Progressive Direct Insurance Company

TOI/Sub-TOI:

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Product Name:

KY Direct 201309

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/

Disposition

Disposition Date: 10/07/2013

Effective Date (New): 09/27/2013

Effective Date (Renewal): 11/06/2013

Status: Acknowledged

Comment: thank you.

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Progressive Direct Insurance Company	-5.000%	-0.200%	\$-71,995	41,102	\$35,997,490	1.807%	-1.163%

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Actuarial Memorandum (if applicable)		Yes
Supporting Document	Histogram (if applicable)		Yes
Supporting Document	Filing Fee		Yes
Supporting Document	LC-1 P&C (8/00) Calculation of Loss Cost Multiplier (if applicable)		Yes
Supporting Document	LC-2 P&C (8/00) Expense Constant Supplement (if applicable)		Yes
Supporting Document	SG-1 Synopsis for Personal Auto-Rate Comparisons		Yes
Supporting Document	Third Party Authorization (if applicable)		Yes
Rate	Factor Pages		Yes

SERFF Tracking #:

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State Tracking #:

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Progressive Direct Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

KY Direct 201309

Project Name/Number:

/

Rate Information

Rate data applies to filing.

Filing Method:

File and Use

Rate Change Type:

Decrease

Overall Percentage of Last Rate Revision:

-3.700%

Effective Date of Last Rate Revision:

06/28/2013

Filing Method of Last Filing:

Prior Approval

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Progressive Direct Insurance Company	-5.000%	-0.200%	\$-71,995	41,102	\$35,997,490	1.807%	-1.163%

SERFF Tracking #:

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State Tracking #:

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Company Tracking #:

State:

Kentucky

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Progressive Direct Insurance Company

TOI/Sub-TOI:

19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

KY Direct 201309

Project Name/Number:

/

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1		Factor Pages		Replacement		KY 2013-09 Direct Factor Pages Exhibit 9_9-23-2013.pdf

BI Base Rate Table

BI BASE
RATE
153.43

Note: The Rate Cap is +/-9%

RBI Base Rate Table

RBI BASE
RATE
118.02

Note: The Rate Cap is +/-9%

Progressive Direct Insurance Company
Kentucky Private Passenger Automobile
Rating Factor Pages

Base Rate Table

PD	UH	UIM	MED	COMP	COLL	LOAN	OPT PIP	PIP	RENT	ROADSIDE	ACPE	GUEST PIP	OPERATIONS EXPENSE	ACQUISITION EXPENSE
117.70	27.70	19.46	6.57	159.81	328.32	19.86	8.01	94.85	14.42	3.40	2.06	20.91	30.42	180.47

Note: The Rate Cap is +/-9%

Base Model Year Table

BASE MODEL
YEAR
2014

Anti-Theft Discount Table

ACTIVE ALARM	PASSIVE ALARM	THEFT DETERRENT	FACTOR
Y	N	N	0.05
N	Y	N	0.15
N	N	Y	0.20
N	N	N	0.00

Usage-Based Insurance Factor Table - UBI Initial Discount

RATE REVISION	UBI GROUP	BI/RBI/PD	MED	COMP	COLL	LOAN	PIP	RENT	ROADSIDE	ACPE	GUEST PIP	OPERATIONS EXPENSE	ACQUISITION EXPENSE
201309	368	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	369	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	370	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	371	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	372	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	373	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	374	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	375	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	376	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	377	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	378	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	379	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	380	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	381	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	382	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	383	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	384	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	385	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	386	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	387	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	388	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	389	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	390	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	391	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	392	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	393	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	394	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	395	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	396	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	397	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	398	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	399	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	400 ... 9999999	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

- Notes:
- a.) If a vehicle does not participate in the usage-based insurance program they are assigned a factor of 1.0.
 - b.) In determining a vehicle's initial UBI discount, refer to the applicable UBI initial discount factor in the rate revision filing applicable to the policy term to which the discount is being applied.
 - c.) In determining the UBI discount for vehicles that have previously received a discount, refer to the applicable UBI Renewal discount factor in the rate revision filing applicable to the policy term prior to the term to which the discount is being applied.
 - d.) If a UBI discount is calculated for the first time during a renewal quote transaction, it will be considered an "initial" UBI discount in determining the discount for both the expiring policy term and the renewal quoted policy term.
 - e.) The premium-weighted average factor for the vehicle is calculated, and cannot be lower than 0.70.
 - f.) If the premium-weighted average factor for the vehicle is greater than 1.0, then a factor of 1.0 is assigned.
 - g.) The average factor is applied to all coverages for the vehicle indicated in the Rate Order of Calculation.
 - h.) The UBI discount is not re-determined for customers who previously completed vehicle data collection, evaluation, and UBI discount determination except in accordance with Rule V13.

Usage-Based Insurance Factor Table - UBI Renewal Discount

RATE REVISION	UBI GROUP	BI/RBI/PD	MED	COMP	COLL	LOAN	PIP	RENT	ROADSIDE	ACPE	GUEST PIP	OPERATIONS EXPENSE	ACQUISITION EXPENSE
201309	368	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	369	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	370	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
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201309	372	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	373	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	374	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	375	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	376	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	377	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	378	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	379	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	380	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
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201309	394	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	395	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	396	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	397	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	398	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
201309	399	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
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19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

KY Direct 201309

Project Name/Number:

/

Supporting Document Schedules

Satisfied - Item:	Actuarial Memorandum (if applicable)
Comments:	
Attachment(s):	KY 2013-09 Direct TOC and Exhibits 1 to 7_9-23-2013.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Histogram (if applicable)
Comments:	
Attachment(s):	KY 2013-09 Direct Exhibit 8_9-23-2013.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Filing Fee
Bypass Reason:	The Rate Filing Fee has been submitted Via SERFF EFT.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	LC-1 P&C (8/00) Calculation of Loss Cost Multiplier (if applicable)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	LC-2 P&C (8/00) Expense Constant Supplement (if applicable)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	SG-1 Synopsis for Personal Auto-Rate Comparisons
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SERFF Tracking #:

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19.0 Personal Auto/19.0001 Private Passenger Auto (PPA)

Product Name:

KY Direct 201309

Project Name/Number:

/

Comments:	Form SG-1 is being submitted separately on the KY DOI Website.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Third Party Authorization (if applicable)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Progressive Direct Insurance Company
Kentucky Private Passenger Automobile

Introduction

The enclosed exhibits present detail and justification for the rate revision of the Progressive Direct Insurance Company in the state of Kentucky.

Table of Contents

<u>Item</u>	<u>Exhibit Number</u>
Proposed Rate Changes	1
Indication	2
Expenses	3
Trend	4
Investment Income	7
Histogram	8
Factor Pages	9

Progressive Direct Insurance Company
Kentucky Private Passenger Automobile

Proposed Rate Changes

We measured the rate changes by calculating rates for in-force policies under the current rating plans, including application of monthly rating factors as of the new business effective date, and determined the percent change in the rate totals for each coverage.

<u>Coverage</u>	<u>Rate Change</u>
BI/RBI	-0.7%
PD	-1.0%
UM	0.0%
UIM	10.0%
MED	-0.1%
PIP/Guest PIP/Optional (Opt.) PIP*	0.0%
COMP	0.0%
COLL	0.0%
LOAN	0.0%
RENT	0.0%
ROADSIDE	0.1%
ACPE	0.0%
Acquisition Expense	0.0%
Operations Expense	0.0%
All Coverages Combined	-0.2%

*Future references of PIP include Guest PIP and Optional (Opt.) PIP data

Progressive Direct Insurance Company
Kentucky Private Passenger Automobile

Determination of Statewide Rate Level Changes

Coverage	Accident Year Ending	Earned Premium	Trended EP @ CRL	Trended & Developed Loss & LAE	Ultimate Loss & LAE Ratio	Budgetary Loss & LAE Ratio	Indicated Change	Selected Weights	Credibility Percent	Cred Wtd Indicated Change
BI/RBI	Jul-12	18,794,250	18,110,268	14,748,428	81.4%	90.2%	-9.7%	51.8%		
	Jul-13	<u>17,352,280</u>	<u>16,826,190</u>	<u>15,310,907</u>	<u>91.0%</u>	<u>90.2%</u>	<u>0.9%</u>	<u>48.2%</u>		
	TOTAL	36,146,530	34,936,458	30,059,335	86.0%	90.2%	-4.6%		83.0%	-4.3%
PD	Jul-13	<u>12,160,897</u>	<u>12,045,566</u>	<u>9,592,824</u>	<u>79.6%</u>	<u>90.2%</u>	<u>-11.7%</u>	<u>100.0%</u>		
	TOTAL	12,160,897	12,045,566	9,592,824	79.6%	90.2%	-11.7%		100.0%	-11.7%
UM	Jul-12	2,077,813	2,253,277	1,108,621	49.2%	90.2%	-45.5%	51.8%		
	Jul-13	<u>2,188,474</u>	<u>2,102,999</u>	<u>695,800</u>	<u>33.1%</u>	<u>90.2%</u>	<u>-63.3%</u>	<u>48.2%</u>		
	TOTAL	4,266,287	4,356,276	1,804,421	41.4%	90.2%	-54.1%		20.3%	-9.7%
UIM	Jul-12	1,064,978	1,298,825	3,823,817	294.4%	90.2%	226.3%	51.8%		
	Jul-13	<u>1,109,169</u>	<u>1,198,616</u>	<u>3,891,174</u>	<u>324.6%</u>	<u>90.2%</u>	<u>259.8%</u>	<u>48.2%</u>		
	TOTAL	2,174,147	2,497,441	7,714,991	309.0%	90.2%	242.4%		16.0%	40.2%
MED	Jul-13	<u>110,700</u>	<u>102,617</u>	<u>48,768</u>	<u>47.5%</u>	<u>90.2%</u>	<u>-47.3%</u>	<u>100.0%</u>		
	TOTAL	110,700	102,617	48,768	47.5%	90.2%	-47.3%		10.8%	-5.1%
PIP	Jul-13	<u>7,679,350</u>	<u>7,398,121</u>	<u>6,605,078</u>	<u>89.3%</u>	<u>90.2%</u>	<u>-1.0%</u>	<u>100.0%</u>		
	TOTAL	7,679,350	7,398,121	6,605,078	89.3%	90.2%	-1.0%		85.5%	-0.9%
COMP	Jul-12	4,820,286	5,956,538	4,872,712	81.8%	88.9%	-7.9%	51.8%		
	Jul-13	<u>5,244,899</u>	<u>5,548,249</u>	<u>3,727,905</u>	<u>67.2%</u>	<u>88.9%</u>	<u>-24.4%</u>	<u>48.2%</u>		
	TOTAL	10,065,185	11,504,787	8,600,617	74.8%	88.9%	-15.9%		100.0%	-15.9%
COLL	Jul-13	<u>13,155,397</u>	<u>12,339,995</u>	<u>9,846,936</u>	<u>79.8%</u>	<u>88.9%</u>	<u>-10.2%</u>	<u>100.0%</u>		
	TOTAL	13,155,397	12,339,995	9,846,936	79.8%	88.9%	-10.2%		100.0%	-10.2%
ROADSIDE	Jul-13	<u>199,085</u>	<u>199,297</u>	<u>201,886</u>	<u>101.3%</u>	<u>88.9%</u>	<u>14.0%</u>	<u>100.0%</u>		
	TOTAL	199,085	199,297	201,886	101.3%	88.9%	14.0%		100.0%	14.0%
All Coverages Combined*	Jul-12	73,241,810								
	Jul-13	<u>73,574,714</u>								
	TOTAL	146,816,524								-5.0%

*Note: All Coverages Combined includes RENT, ACPE, LOAN, ACQUISITION EXPENSE, and OPERATIONS EXPENSE

Progressive Direct Insurance Company
Kentucky Private Passenger Automobile

Expenses		
<u>Expense Category</u>	<u>Liability % of Written Premium</u>	<u>Physical Damage % of Written Premium</u>
Operating Expense	2.0%	2.0%
Product & Pricing Expense	0.3%	0.3%
Taxes, Licenses, and Fees	4.2%	4.2%
Revenue Adjustments	1.0%	1.0%
Profit	4.0%	4.0%
Investment Income*	1.6%	0.2%
Total Budgeted Expenses	9.8%	11.1%
Budgetary Loss and LAE Ratio	90.2%	88.9%

*Investment Income is a negative expense and is subtracted when determining Total Budgeted Expenses.

**Advertising and call center expenses are considered separately.

Progressive Direct Insurance Company
Kentucky Private Passenger Automobile

Determination of General Trends

The selected annual trend percentages for individual coverage severity and frequency were determined by examining Progressive 12-month moving average data through 07/31/2013. Actuarial judgment was used to make the selects.

NET TREND = SEVERITY TREND FACTOR * FREQUENCY TREND FACTOR / EARNED PREMIUM@CRL TREND FACTOR - 1

Coverage	Progressive 2 Year Annualized Trend	Progressive 1 Year Annualized Trend	Historic to Present Trend Selected	Present to Future Avg Date of Loss Selected
BI/RBI	7.2%	2.2%	5.8%	2.2%
PD		1.9%	1.9%	1.9%
PIP		0.0%	1.3%	0.0%
COMP	-3.5%	-11.9%	-3.2%	-3.2%
COLL		-2.5%	-0.5%	0.0%

TREND PERIOD

Accident Year Ending	Midpoint of Accident Year	Average Effective Date of Rate Revision	Duration between Rate Revisions	Policy Term	Trend-to-Date* (Future Avg Date of Loss)
Jul-12	Jan-12	30-Oct-13	6	6.08	2-May-14
Jul-13	Jan-13	30-Oct-13	6	6.08	2-May-14

Accident Year Ending	Historic Months in Span**	Historic Trend Period	Future Months in Span***	Future Trend Period
Jul-12	18	1.5	9.03	0.75
Jul-13	6	0.5	9.03	0.75

* Effective Date + 1/2 (Projected Duration) + 1/2 (Policy Term)

** Number of months between Midpoint of Accident Year (Average Date of Loss) and the Present-Trend-to-Date

*** Number of months between Present-Trend-to-Date and the Future-Trend-to-Date (Future Average Date of Loss)

Projection Period is calculated by taking the Months in Trend and dividing by 12 to annualize the period.

Progressive Direct Insurance Company
Kentucky Private Passenger Automobile

Effect of Investment Income

In setting the provision for profit, in the BLR, the other income from investment earnings attributable to unearned premium and loss reserves was considered as follows:

	Auto Liability	Auto Physical Damage
1. Loss & Loss Expense Reserves at 12/31/11	\$5,114,513,485	\$40,345,381
2. Loss & Loss Expense Reserves at 12/31/12	\$5,518,702,720	\$79,206,433
3. Mean Loss & Loss Expense Reserves	\$5,316,608,103	\$59,775,907
4. Unearned Premium Reserves at 12/31/11	\$2,325,875,044	\$1,448,543,936
5. Unearned Premium Reserves at 12/31/12	\$2,490,494,218	\$1,569,459,681
6. Mean Unearned Premium Reserves	\$2,408,184,631	\$1,509,001,809
7. Deduction for Prepaid Expenses	\$355,448,052	\$222,728,667
8. Gross Investment Reserve	\$7,369,344,682	\$1,346,049,049
9. Deduction for Agent Balances	\$1,434,416,681	\$898,825,338
10. Net Investment Reserve	\$5,934,928,001	\$447,223,711
11. Net Investment Income	\$509,313,220	\$509,313,220
12. Cash & Invested Assets	\$15,514,160,993	\$15,514,160,993
13. Rate of Investment Income	3.3%	3.3%
14. Investment Income on All Reserves	\$194,665,638	\$14,668,938
15. Earned Premium	\$9,141,555,673	\$5,261,888,034
16. Investment Income as a % of EP Before Federal Income Tax	2.1%	0.3%
17. Investment Income as a % of EP After Federal Income Tax	1.6%	0.2%

Source: All Progressive Companies Combined 2012 Annual Statement

Progressive Direct Insurance Company
 Kentucky Private Passenger Automobile

Histogram of Rate Changes Over Past 12 Month Period - All Markets Combined
 Based on 31,800 policies

Percent Change - Renewal Policies Only

				<u>Freq</u>	<u>Cum. Freq</u>	<u>Percent</u>	<u>Cum. Percent</u>
-19.73%	TO	-10.01%	*****	46	46	0%	0%
-10.00%	TO	-0.01%	*****	13,143	13,189	41%	41%
0.00%	TO	0.00%	*****	20	13,209	0%	42%
0.01%	TO	10.00%	*****	12,719	25,928	40%	82%
10.01%	TO	22.23%	*****	5,872	31,800	18%	100%