



On the Record: A Former Chief Actuary
Shares her Eventful Ten-Year Journey at the Insurance
Corporation of British Columbia
Camille Minogue

Presented to the Casualty Actuaries of the Northwest, Portland, Oregon, September 25, 2015

#### **Session Description**

Former chief actuary of the Insurance Corporation of British Columbia (ICBC) Camille Minogue will tell of the most memorable actuarial challenges of her time at the organization. The general requirement that the ICBC operate with openness and transparency has implications for what actuarial methods can be used and still be understood; it also means that the actuarial work product is under an intense public magnifying glass. Ms. Minogue will provide explanations, grounded in accepted actuarial practice, of how she developed relationships of trust and credibility with the regulator and other stakeholders.

#### Timeline of Actuarial Challenges

2003 ICBC comes under regulation of BCUC

2004 Camille joins ICBC as new chief actuary

**2005-06** Upward trending LDFs

2007 Uneventful year

2008-09 The recession hits

2010 Shift in claims frequency trend

2011-14 Significant internal and external impacts on the data

2015 Camille departs ICBC

## Quick Backgrounder on ICBC

#### ICBC is

- Owned by the BC government
- Both a monopoly and competitive
  - Sole provider of compulsory ("Basic") automobile coverage in B.C.
    - Utilities Commission regulates rates and capital requirements
  - Offers "Optional" coverages
    - Competes with other insurers for this business
    - BCUC does not regulate Optional
    - Not the subject of today

#### Basic Auto Insurance in BC

- A full tort product
  - No minor injury caps or thresholds
- Coverages include
  - Bodily injury and property damage (3<sup>rd</sup> party)
  - Accident and death benefits (1st party)
- Today's focus is on Basic bodily injury
  - Makes up about 75% of ICBC's Basic claims costs

#### Overview of ICBC's Regulatory Process

#### Only Basic insurance is regulated:

- 1. ICBC files rate applications with BCUC
- 2. ICBC holds public workshops on its applications
- 3. Interested parties may ask ICBC questions on its application
  - ► Information Requests (IRs)
- 4. ICBC must respond to relevant IRs
- 5. ICBC defends its applications in oral hearings

#### Participants include...

- Insurance Bureau of Canada
- Canadian Bar Association
- Canadian Consumer Association
- COPE Local 378
- Insurance Brokers Association of BC
- Coalition Against No Fault in BC
- Federated Anti-Poverty Groups of BC
- ▶ BC Coalition for Disabled People
- BC Old Age Pensioners Organisation
- BC Chiropractic Association
- Toward Responsible, Educated and Attentive Driving (TREAD)
- Canadian Direct
- Canadian Northern Shield
- Family Insurance
- And a number of interested individuals

# Size and Scale of ICBC's Regulatory Proceedings

#### **Example: Stats on 2005/06 Regulatory Proceedings**

- Application
  - Initially requested no rate change
  - Amended application to request rate increase of 6.5%
  - Included new capital management plan for approval
  - ▶ Total of 1,350 pages
- Information requests
  - Hundreds from both the BCUC and Intervenors
  - ▶ ICBC's responses totaled about 4,500 pages
- ▶Oral hearing lasted six full days
  - Actuarial witness panel was on for three days
  - Other witness panels included Claims, Road Safety, H.R.
  - Transcripts numbered 1,500 pages

# A case of upward trending LDFs...

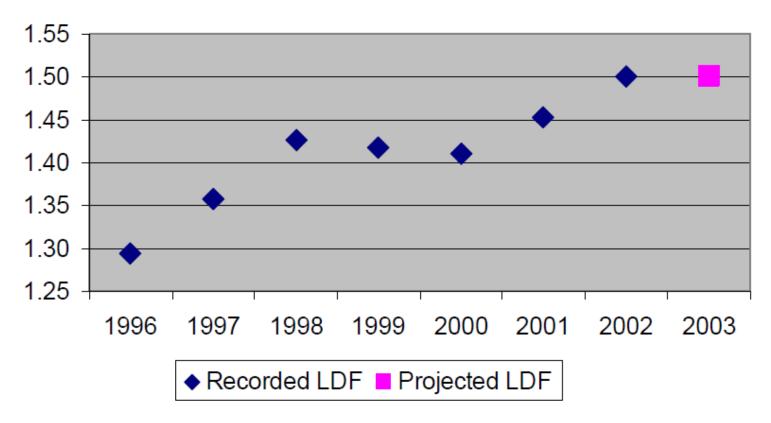
2005/2006 Application



#### Loss Reserving Practice

#### Basic BI Paid LDF

4th Payment Year at Nov. 2005

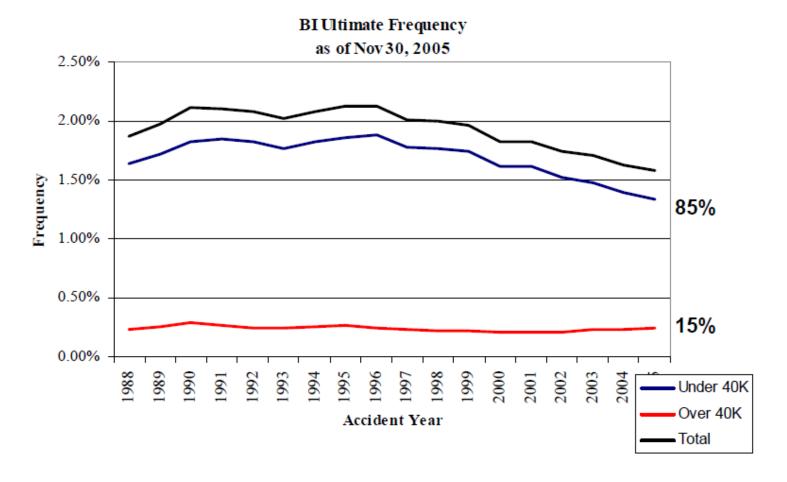


BCUC - April 3, 2006

http://www.bcuc.com/Documents/Proceedings/2006/DOC\_11093\_B-38\_Outstanding%20IRs.pdf



#### BI Ultimate Frequency



http://www.bcuc.com/Documents/Proceedings/2006/DOC\_11093\_B-38\_Outstanding%20IRs.pdf

55

BCUC - April 3, 2006



#### Illustration: Impact of Shift in Mix on LDFs

Accident Year	Loss Size	LDF (12-24 months)	Distribution	Combined LDF (12-24 months)
2001	Small Claims	1.0781		
	Large Claims	2.0564		
,				
2003	Small Claims	1.0773		
	Large Claims	2.0140		
BCUC - April 3, 2008	http://www.bcu	c.com/Documents/Proceed	lings/2006/DOC_11093_B-38_	_Outstanding%20IRs.pdf

#### Response:

The requested table is shown below for each coverage is shown in the tables below.

Table 1: BI Ultimate Loss and ALAE Estimates

BI Ultimate Loss and ALAE Estimates (\$000's)					
Accident	Dec-04	Aug-05			
Year	Exhibit B.1.1.1				
1988	\$504,569	\$504,362			
1989	612,612	612,300			
1990	725,716	725,385			
1991	716,926	716,347			
1992	713,962	713,493			
1993	714,038	714,464			
1994	783,349	783,240			
1995	822,179	821,617			
1996	840,357	839,157			
1997	810,619	810,345			
1998	816,716	817,167			
1999	814,326	816,275			
2000	820,598	827,585			
2001	820,099	838,576			
2002	830,457	870,167			
2003	877,313	948,928			
2004	902,767	968,551			
Total	\$13,126,603	\$13,327,960			

Comparison Aug-05 minus Dec-04		
	-\$207	
	-312	
	-331	
	-579	
	-469	
	426	
	-109	
	-562	
	-1,200	
	-274	
	451	
	1,949	
	6,987	
	18,477	
	39,710	
	71,615	
	65,784	
	\$201,356	

http://www.bcuc.com/Documents/Proceedings/2005/DOC\_9585\_B-23\_ICBC%20PART%202%20-%20Resps%20to%20Intervenor%20IRs.pdf

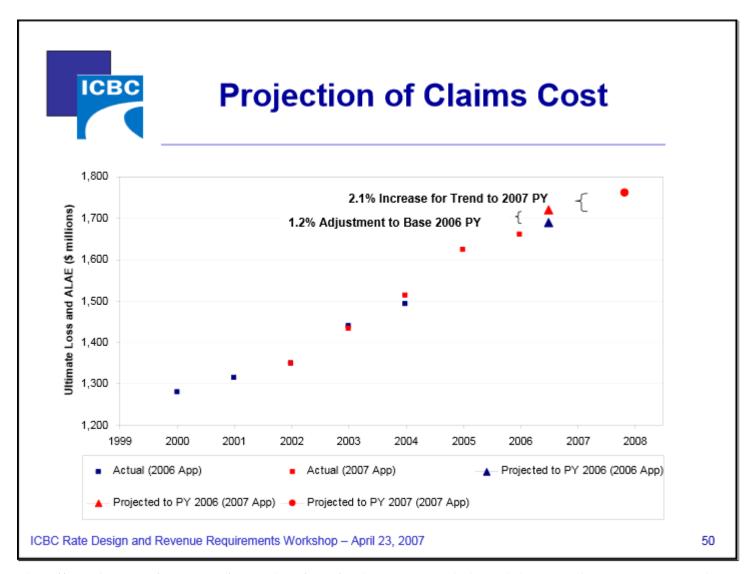
#### Rate Application Approved

Table 14.10 Summary of the Revised Rate Indication

Line No.	Description	Percentage Change
1	October 2005 Rate Indication	4.2%
2	Capital Build	0.6%
3	Capital Maintenance	1.7%
4	Total Revised Rate Indication	6.5%

## An uneventful year...

2007 Application



 $http://www.bcuc.com/Documents/Proceedings/2007/DOC\_15039\_B-6\_ICBC\_Workshop\_Presidentation-04-23-07.pdf$ 



#### 2007 Basic Insurance **Revenue Requirements**

Adjustment to 2006 Base Policy Year + 1.2%

Trend to 2007 Policy Year + 2.1%

Capital Provision + 0.2%

Other - 0.2%

2007 Required Rate Level Change + 3.3%

http://www.bcuc.com/Documents/Proceedings/2007/DOC\_15039\_B-6\_ICBC\_Workshop\_Presidentation-04-23-07.pdf

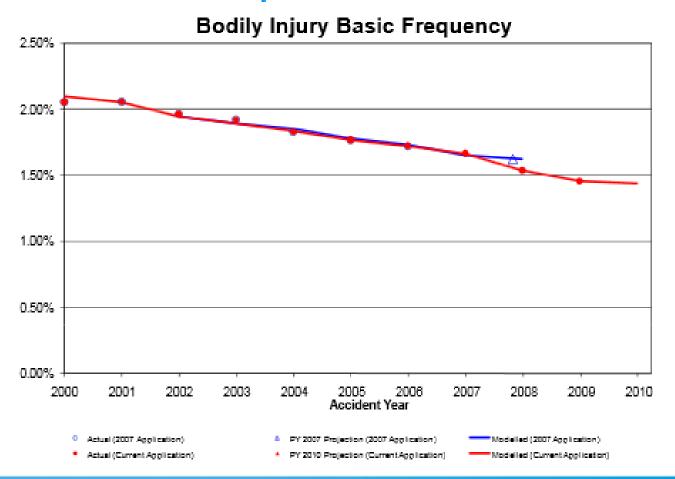
ICBC Rate Design and Revenue Requirements Workshop - April 23, 2007

47

# The favourable effect of the recession...

2010 Application

## Loss Cost Update

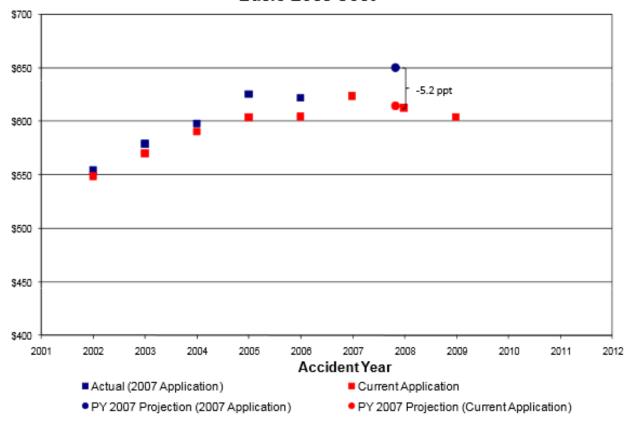


 $\textbf{30} \quad \text{http://www.bcuc.com/Documents/Proceedings/2010/DOC\_25730\_B-5\_ICBC-Presentation-and-Supplementary-Information.pdf}$ 



### Loss Cost Update





 ${\bf 11} \quad http://www.bcuc.com/Documents/Proceedings/2010/DOC\_25730\_B-5\_ICBC-Presentation-and-Supplementary-Information.pdf$ 



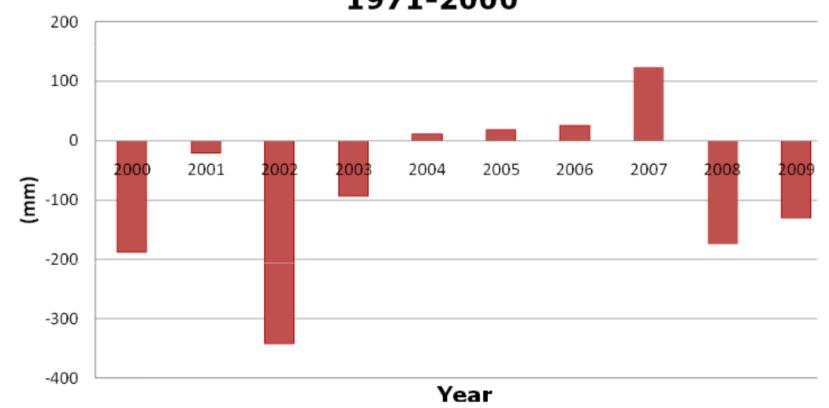
## Claims Costs – Key Factors

- 2008 and 2009 drier than 30-year average
- 2008 and 2009 recession
- Enhanced and expanded claims initiatives since 2007



## Precipitation - History

## Precipitation Compared to Average 1971-2000

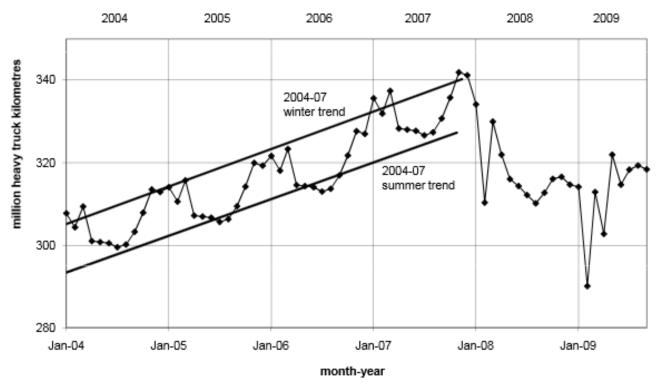


15 http://www.bcuc.com/Documents/Proceedings/2010/DOC\_25730\_B-5\_ICBC-Presentation-and-Supplementary-Information.pdf



## Recession Impact

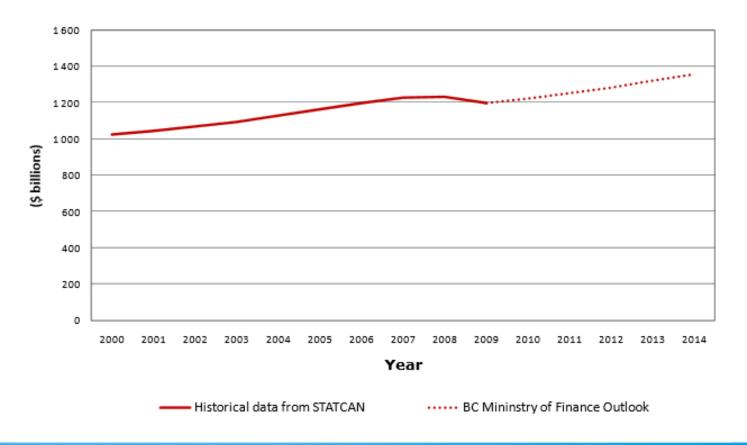
#### Travel in BC Estimated from Highway Volumes and Diesel Sales





## **Economic Recovery**

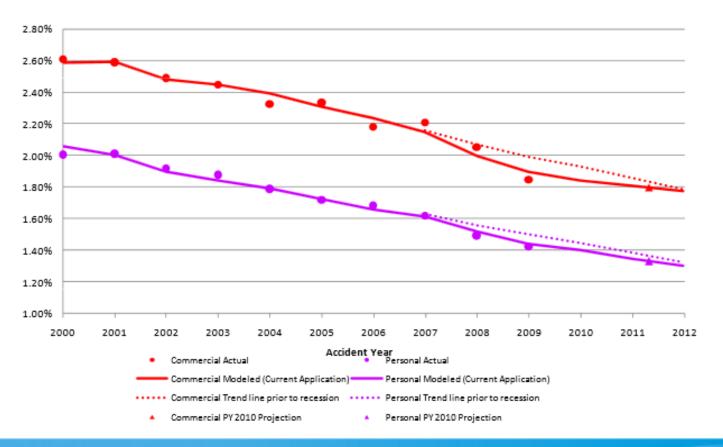
#### **BC Gross Domestic Product (GDP)**





## Loss Trending

#### BI Basic Frequency - Personal and Commercial

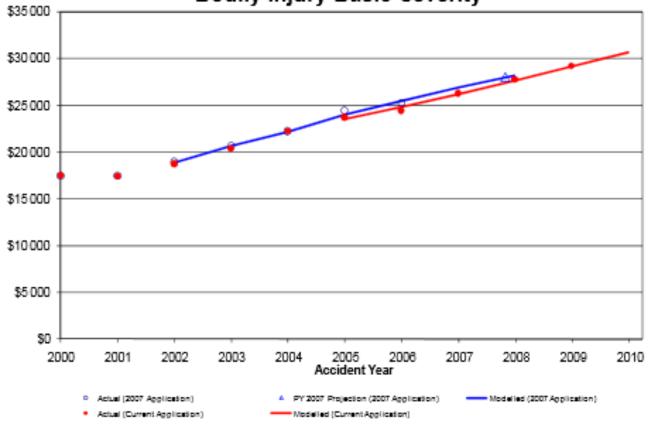


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## Loss Cost Update





31 http://www.bcuc.com/Documents/Proceedings/2010/DOC\_25730\_B-5\_ICBC-Presentation-and-Supplementary-Information.pdf



## Overview of Rate Change

Component	Impact
PY 2007 Loss Cost Forecast Variance	-5.2 ppt
Loss Trend to PY 2010 and Prospective Adjustments	+1.7 ppt
Trend in Average Premium	+1.3 ppt
Change in Investment Income	-1.2 ppt
Change in Capital Provisions	-0.8 ppt
Change in Operating Expenses	+1.5 ppt
Other	+0.8 ppt
PY 2010 Indicated Rate Level Change	-1.9 ppt

http://www.bcuc.com/Documents/Proceedings/2010/DOC\_25730\_B-5\_ICBC-Presentation-and-Supplementary-Information.pdf

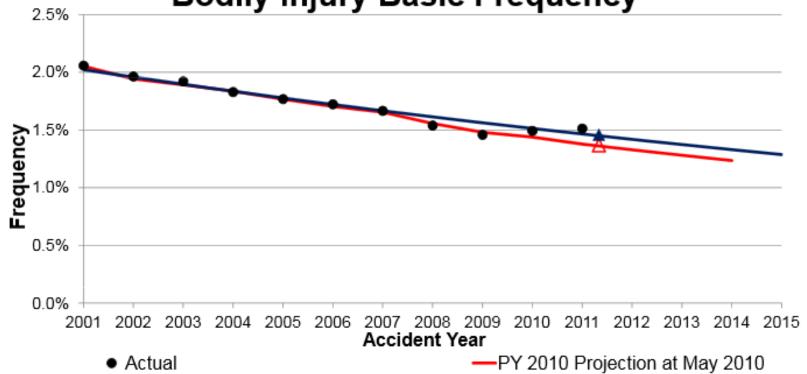


# A permanent and significant shift in BI frequency...

2012 Application

#### BI Frequency Forecast – 2012 RRA





- -PY 2010 Projection at Dec 2011
- ▲ PY 2010 Projection at Dec 2011

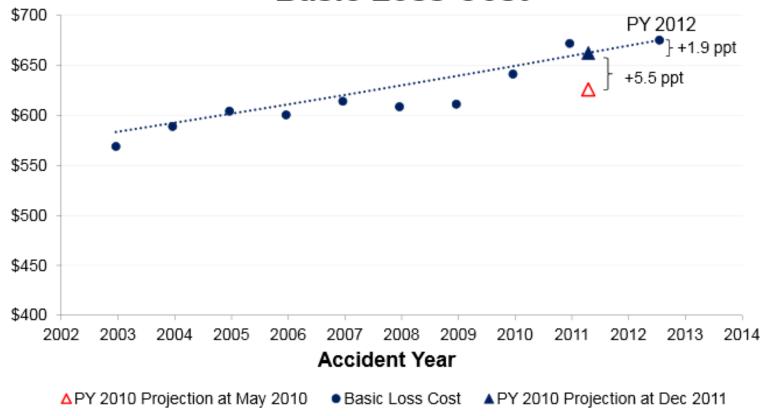
△ PY 2010 Projection at May 2010





## Claims Costs Increasing

#### **Basic Loss Cost**



48 http://www.bcuc.com/Documents/Proceedings/2012/DOC\_29703\_B-4\_ICBC\_Workshop-Presentation.pdf

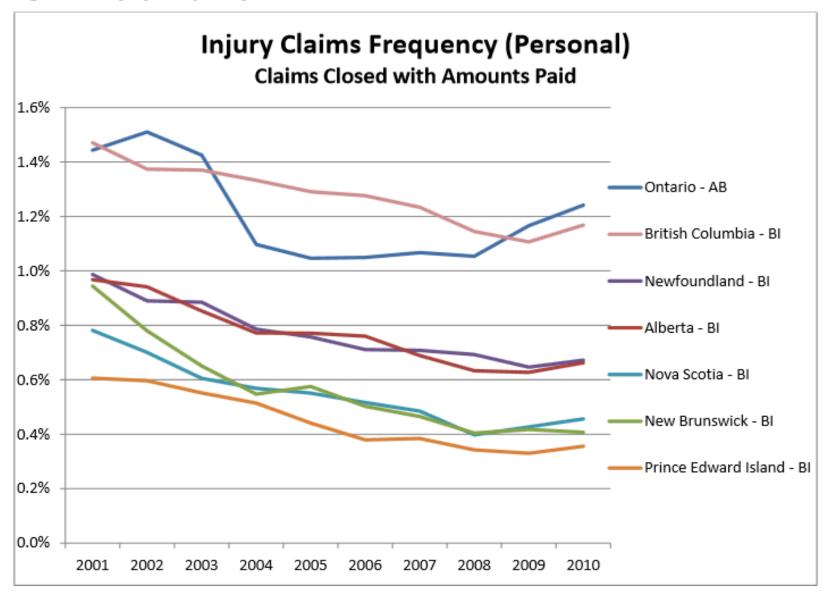


## IRC findings cont'd

- ... claim frequency, on a countrywide basis, is no longer decreasing.
- ... the effect of rising claim severity has been magnified by the simultaneous increase in claim frequency ... 2010 marks the last year since 1984 that BI claim frequency did not decline.



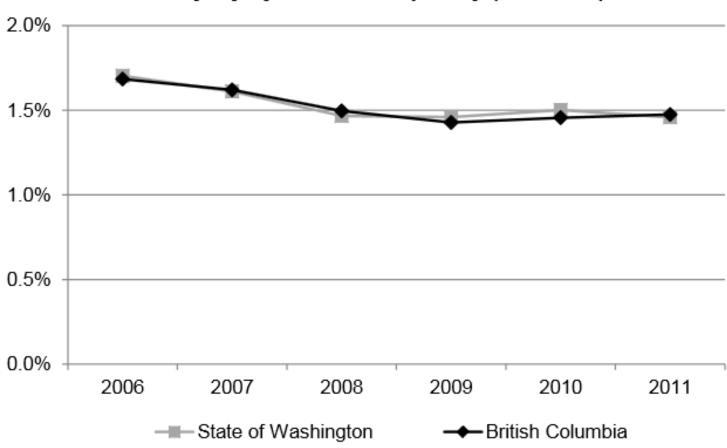
Figure 1 – Injury Frequency – Select Provinces



http://www.bcuc.com/Documents/Proceedings/2012/DOC\_30772\_B-13\_ICBC-Responses-BCUC-Panel.pdf

Figure 5 – Comparison of BC and Washington State

#### **Bodily Injury Claims Frequency (Personal)**



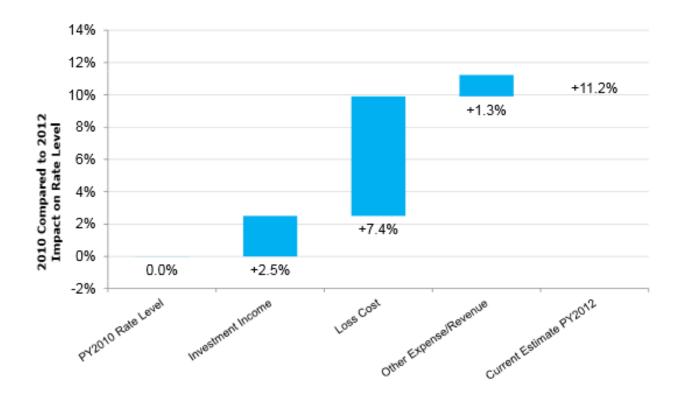
http://www.bcuc.com/Documents/Proceedings/2012/DOC\_30772\_B-13\_ICBC-Responses-BCUC-Panel.pdf

## BI Frequency – Key Factors

- Causes of higher frequency not fully understood
  - Travel factor doesn't fully explain recent increases
- Currently researching other potential factors



#### Pressure on basic rates



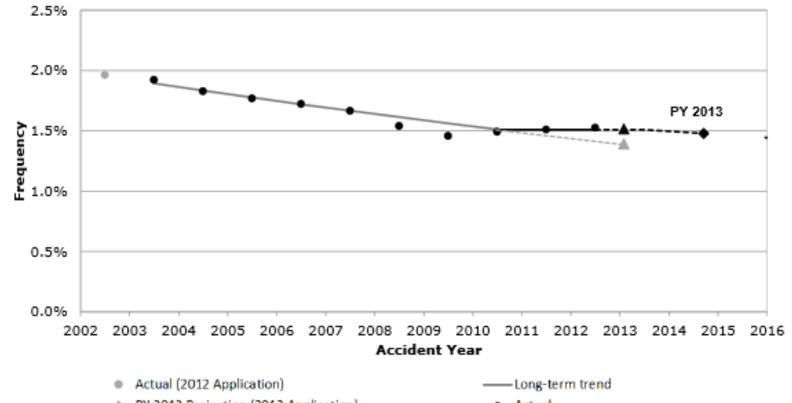
3 http://www.bcuc.com/Documents/Proceedings/2012/DOC\_29703\_B-4\_ICBC\_Workshop-Presentation.pdf



## Back with an answer...

2013 Application

## BI Frequency Forecast



PY 2012 Projection (2012 Application)

▲ PY 2012 Projection (Current Application)

- Actual
- · PY 2013 Projection (Current Application)

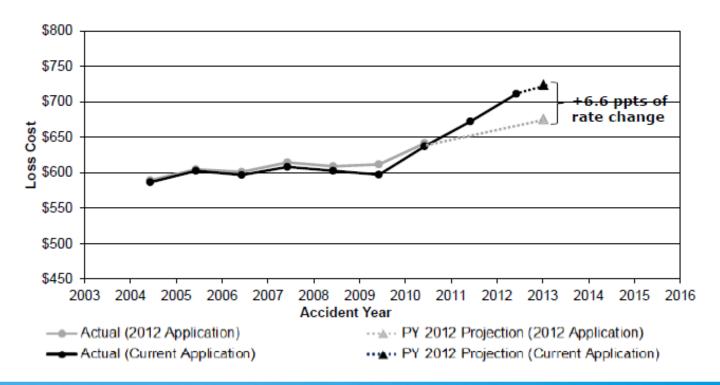
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## Loss Cost Forecast Variance

(all coverages)

Difference is the Loss Cost Forecast Variance



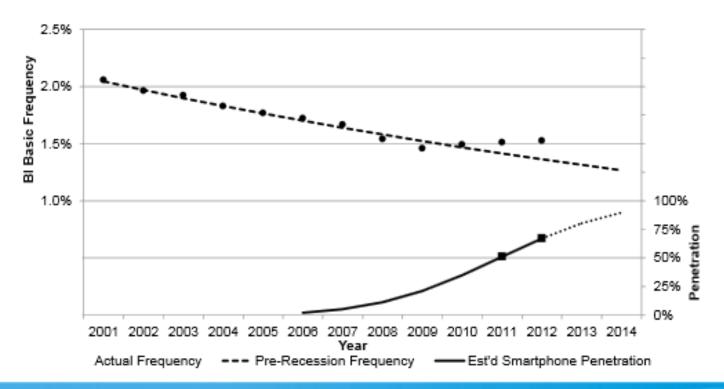
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 $http://www.bcuc.com/Documents/Proceedings/2012/DOC\_30772\_B-13\_ICBC-Responses-BCUC-Panel.pdf$ 



## Smartphone Penetration

 Increase in the usage of smartphones is concurrent with the flattening of frequency



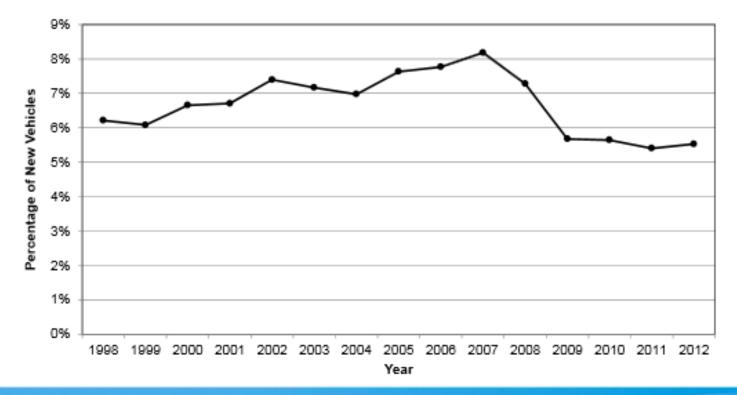
51

 $http://www.bcuc.com/Documents/Proceedings/2013/DOC\_35889\_B-2\_ICBC\_Workshop\_Presentation.pdf$ 



#### New Vehicles Sales

Percentage of new vehicles dropped during the recession and has not recovered by the end of 2012

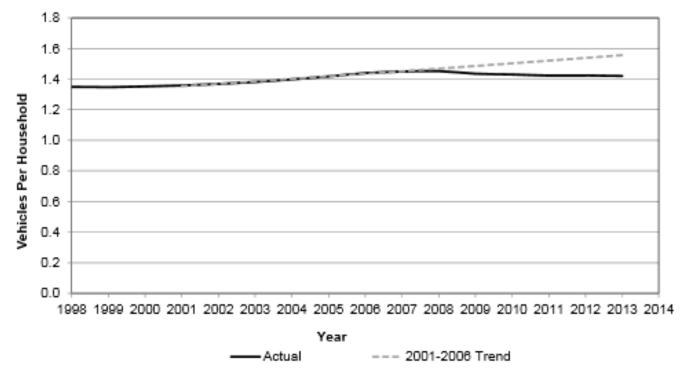


http://www.bcuc.com/Documents/Proceedings/2013/DOC\_35889\_B-2\_ICBC\_Workshop\_Presentation.pdf



### Vehicles Per Household

 The number of insured vehicles per BC household is no longer increasing.



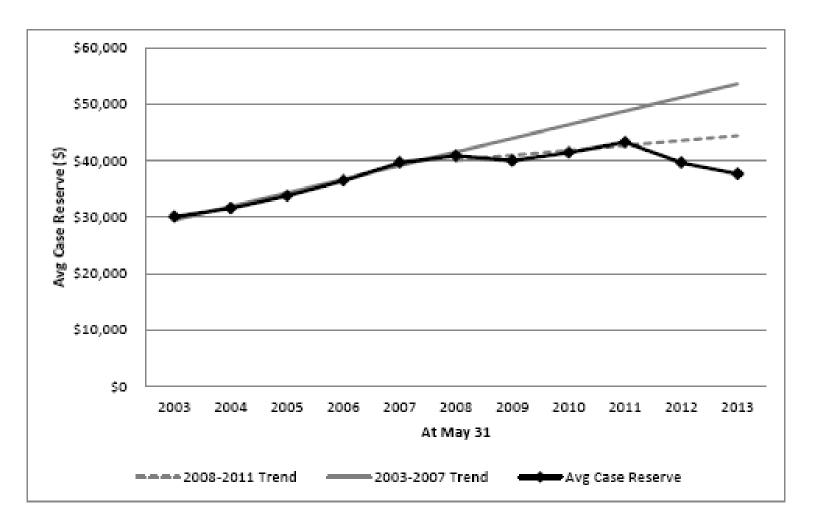
ICBC

# Operational changes significantly impact the data...

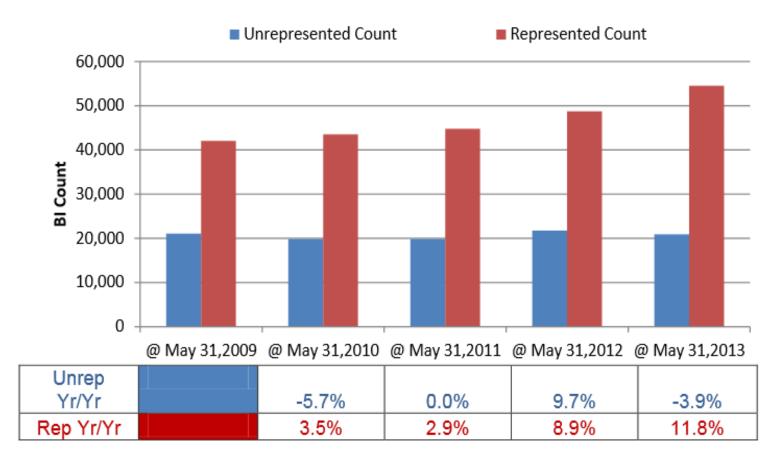
2013 Application

### Lower Average Case Reserves

Figure C.1 – BI Basic Average Case Reserves



## High Growth in Open Represented Claims

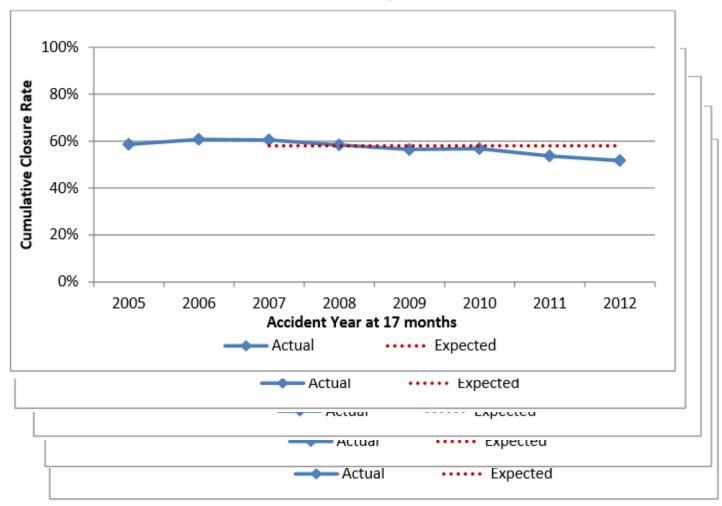


<sup>\*</sup> BI Count is exposure count, and includes both Personal and Commercial claim exposures

**12** | 5

#### Slowdown in Closures

Figure 1a – Accident Year 2012 Closure Rate Comparison – Basic Personal BI



http://www.bcuc.com/Documents/Proceedings/2013/DOC\_37379\_B-3\_ICBC\_IR-Responses\_1-99.pdf @1350-2

## Citing authority to bolster our argument

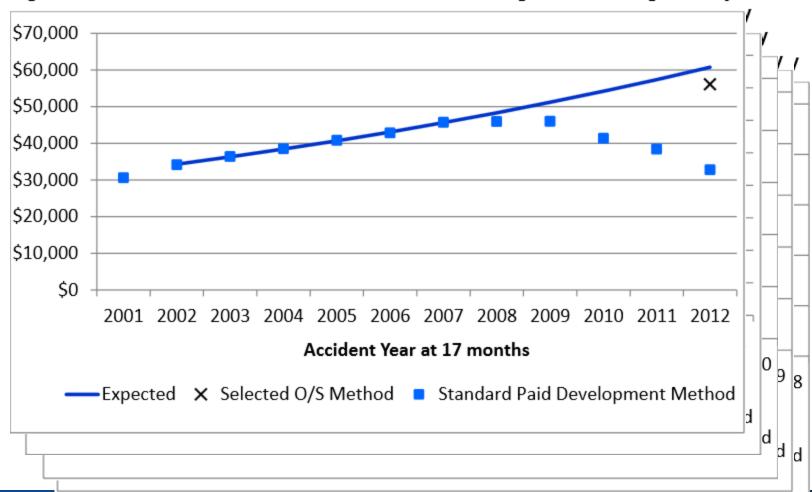
When the Development Technique Works and When it Does Not...

Actuaries often speak of the leveraged effect of claim development factors with high values. For example, if the cumulative reported claim development factor is 4.00, each dollar of reported claims is multiplied by a factor of 4.00 to determine ultimate claims. ... These highly leveraged factors result in projections of ultimate claims that are very sensitive to the current value of paid and reported claims. [A]ny unusual change in the reporting or settlement of claims ...can result in unreasonable projections of ultimate claims for the most recent accident years. In situations of highly leveraged cumulative claim development factors, actuaries often seek alternative techniques for estimating unpaid claims.

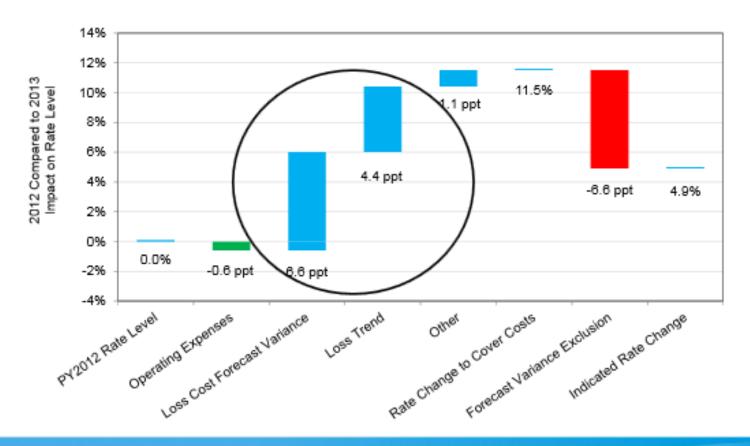
<sup>&</sup>lt;sup>1</sup> Jacqueline Friedland, "Estimating Unpaid Claims Using Basic Techniques", *Casualty Actuarial Society*, 2010, pages 95-97.

# Replacement Method "Hindsight Outstanding"

Figure 1a – Accident Year 2012 – BI Basic Personal Hindsight Outstanding Severity



## Rate Change Components





36 http://www.bcuc.com/Documents/Proceedings/2013/DOC\_35889\_B-2\_ICBC\_Workshop\_Presentation.pdf

## A Pleasant Surprise...

```
CROSS-EXAMINATION BY MR. MILLER:

MR. MILLER: Q: Good morning, panel. First of all,

Staff and the actuarial consultants would like to

commend the Insurance Corporation for a well prepared
```

Allwest Reporting Ltd., Vancouver, B.C.

ICBC - Revenue Requirements February 11, 2014, Volume 4

Page: 552

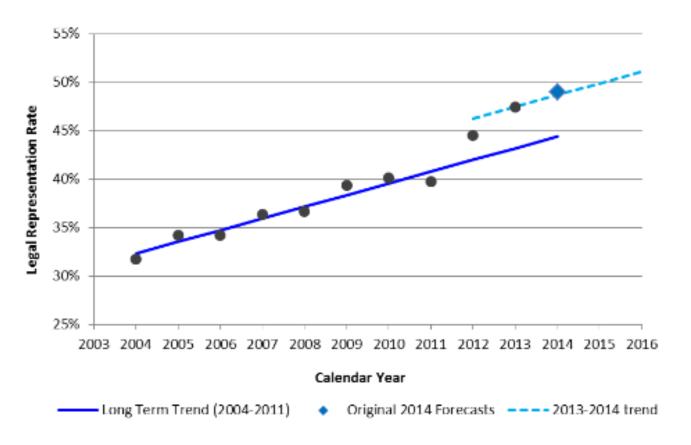
actuarial component of the application. It's better
than they've seen in many jurisdictions, so welcome --

http://www.bcuc.com/Documents/Transcripts/2014/DOC\_40590\_02-11-2014-ICBC-OralHearingVol-4.pdf@551-2

# Acceleration in Legal Representation

2014 Application

## Rate of represented BI claims



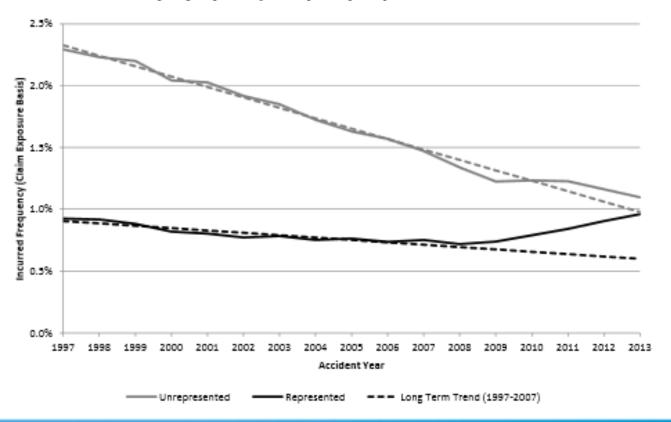
http://www.bcuc.com/Documents/Proceedings/2014/DOC\_42149\_B-4\_ICBC-Informational-Presentation.pdf



#### Claims Estimation Methodology

## Mix of Claims - Representation

#### Bodily Injury Frequency – by Representation Status



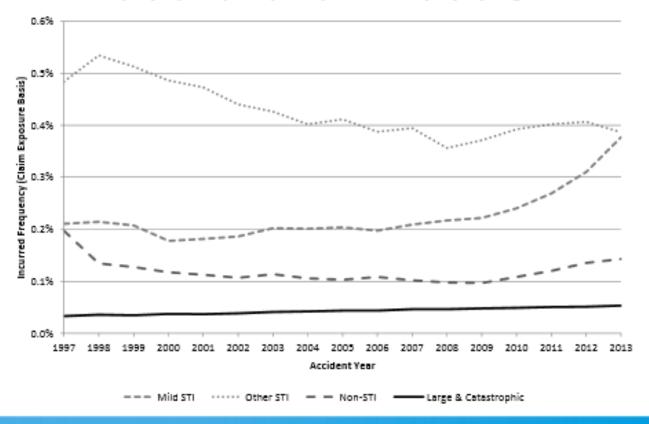
http://www.bcuc.com/Documents/Proceedings/2014/DOC\_42320\_B-7\_ICBC-WorkingSessionPresentation.pdf



#### Claims Estimation Methodology

## Mix of Represented Claims

#### Bodily Injury Frequency – Represented by Injury Segment

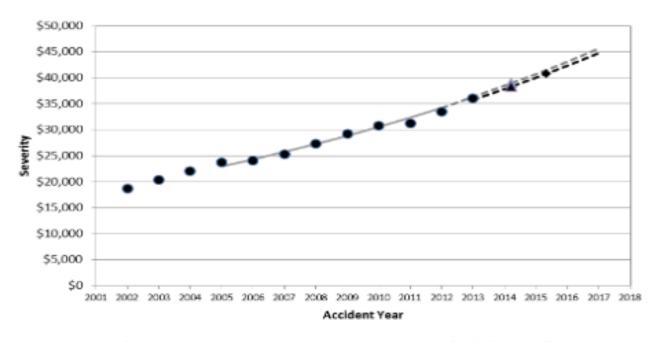


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http://www.bcuc.com/Documents/Proceedings/2014/DOC\_42320\_B-7\_ICBC-WorkingSessionPresentation.pdf



## **BI** Severity



- Actual
   Modelled (2013 Application)
   Projection (2013 Application)
- --- Projection (Current Application)

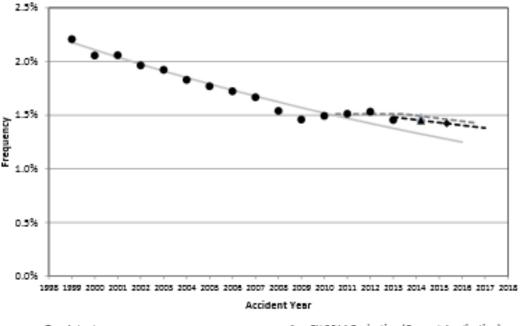
- PY 2013 Projection (2013 Application)
- ▲ PY 2013 Projection (Current Application)
- PY 2014 Projection (Current Application)



http://www.bcuc.com/Documents/Proceedings/2014/DOC\_42149\_B-4\_ICBC-Informational-Presentation.pdf



## BI Frequency Forecast

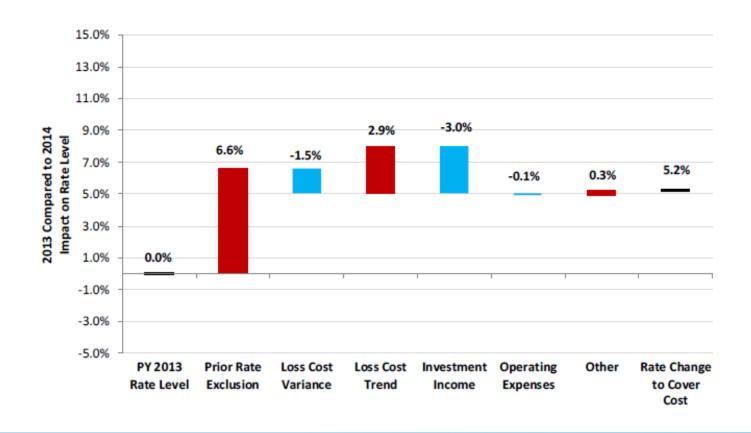


- Actual
- PY 2013 Projection (2013 Application)

- PY 2014 Projection (Current Application)
- ▲ PY 2013 Projection (Current Application)
- ==== Model (2013 Application) ==== Model (Current Application)



## Components of 2014 rate change

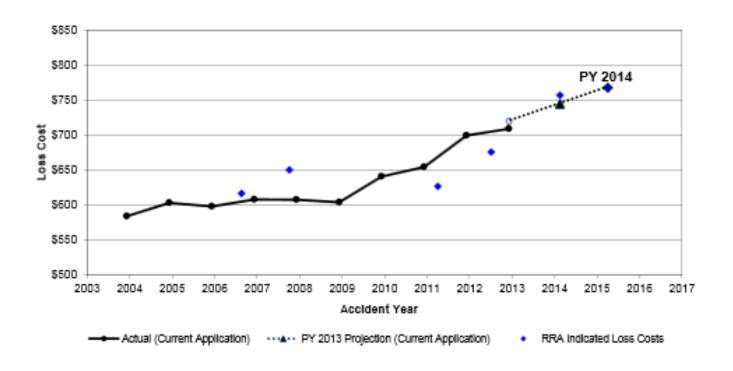


10 http://www.bcuc.com/Documents/Proceedings/2014/DOC\_42149\_B-4\_ICBC-Informational-Presentation.pdf



#### Claims Estimation Methodology

## Unbiased Estimates Comparison of Previous RRA Estimates





## In Closing...

#### Is it worth all that effort?

#### Benefits of Regulatory Process to ICBC

- Gives the public confidence in the management of ICBC
- Rates have been more closely aligned to costs than the period previous to regulation
- Drives a very high standard in all company analyses
  - ▶ Better management decisions

#### Disadvantages

- Other priorities of management often take a back seat
- Costly in terms of time and effort

## Camille's Recipe for Success in Regulatory Proceedings

- Try to keep explanations at a high level
  - But be prepared to peel the onion back several layers
- Be conversant in how your work conforms to standards of practice and the statements of principles
- Back your statements with evidence or expert opinion
  - When no evidence, have a logically intuitive explanation
- Estimates should be best unbiased estimates
  - Important for developing a track record of unbiasedness
- Ensure rigorous peer review of analysis
- Duty to the public first

## Questions?