ATTACHMENT 2

ACTUARIAL ANALYSIS

Report on the Actuarial Valuation

of the

Pennsylvania Mine Subsidence Insurance Fund

Actuarial Analysis as of December 31, 2011

March, 2012

Pinnacle Actuarial Resources, Inc. 374 Meridian Parke Lane, Suite C Greenwood, IN 46142

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EXHIBITS

I. BACKGROUND

Purpose & Scope

Pinnacle Actuarial Resources, Inc. (Pinnacle) was retained by the Pennsylvania Department of Environmental Protection (DEP or Department) to provide an actuarial valuation of the Mine Subsidence Insurance Fund (MSI Fund or Fund) as of December 31, 2011.

Fund History

Mine Subsidence Insurance typically covers structural damage to residential and/or commercial buildings and specific affixed appurtenances as the result of surface ground movement following a mine subsidence event. In the late 1950s this coverage in the Pennsylvania commercial market place became cost prohibitive. The Commonwealth created the MSI Fund in the early 1960s to address the lack of available affordable coverage.

The MSI Program is administered under the Bureau of Mining and Reclamation, Department of Environmental Protection, taking advantage of administrative resources available to the DEP, including premium collection, policy issuance, claim investigation, claim payments, and data collection. Initial funding for the MSI Fund came from a one million dollar grant. Subsequent premium collections have elevated the Fund balance to over eighty five million dollars as of December 31, 2011. As of June 30, 2011 The Fund carried a sixty seven million dollar liability reserve in lieu of reinsurance in addition to five million dollars reserved for catastrophes. Over fifty seven thousand structures are currently insured, providing over nine billion dollars of coverage.

Coverage under the Fund is limited to \$500,000. This is an increase from the prior analysis when the coverage was limited to \$250,000, with lesser limits being available prior to 2003. These limitations have greatly reduced the risk of catastrophic loss due to an insured structure having a claim.

I. BACKGROUND

Premiums are established by formulas that vary by type of structure (residential versus non-residential) and amount of coverage. A ten percent discount is offered to residential owners who are 65 years of age or older (applies to primary residence only).

It is desired that the MSI Fund remain solvent, providing low-cost coverage that is economically administered, resulting in increased subscriptions.

Methodology

Claims data were analyzed to determine outstanding loss, reporting patterns, average claims, and the adequacy of rate levels. Relevant criteria were utilized in producing a future cash flow model. Standard actuarial techniques were employed throughout. Details are contained in this report and attached exhibits.

Data

The primary source of data was special detail claims and summarized policy runs against MSI Fund databases. Little adjustment to data fields in terms of correction was needed. In some cases occurrence dates had to be reformatted or judgmentally selected. Amy Berrios supplied the internal data to us. Additional insight on Fund operation was provided by Larry Ruane, Administrator, and Amy Berrios in follow up phone calls, and subsequent emails. Data was primarily reviewed on a Fiscal Report Year basis.

Another key data source was the annual MSI Fund Board meeting minutes on the MSI Fund website. This was a valuable resource in pulling financial and other operation information. Data therein was generally on a Fiscal Year basis and included several years of historic detail.

Some external data was also utilized, including general insurance industry statistics.

I. BACKGROUND

Please note that for the purposes of this report, the accounting date (the date used to separate the paid versus unpaid claim estimates) is June 30, 2011, the valuation date (the date through which transactions are included in the data used to estimate the unpaid claim estimates) is December 31, 2011, and the review date (the cutoff date for including information to the actuary) is February 7, 2012, although most of the data items were not physically transmitted to us until January or early to mid-February.

Distribution & Use

This study has been conducted at the request of DEP officials.

The exhibits attached in support of our findings are an integral part of this report. These sections have been prepared so that our actuarial assumptions and judgments are documented. Judgments about the conclusions drawn in this report should be made only after considering the report in its entirety. We remain available to answer any questions that may arise regarding this report. We assume that the user of this report will seek such explanation on any matter in question.

Our conclusions are predicated on a number of assumptions as to future conditions and events. Those assumptions, which are documented in subsequent sections of this report, must be understood in order to place our conclusions in their appropriate context. In addition, our work is subject to inherent limitations, which are also discussed in this report.

Reliances & Limitations

We have prepared this report in conformity with its intended use by persons technically competent in the areas addressed and for the stated purposes only. Judgments as to conclusions, methods, and data contained in this report should be made only after studying the report in its entirety. Furthermore, we are available to explain any matter presented herein.

I. BACKGROUND

Throughout our analysis we have, without audit or verification, relied on historical data and qualitative information provided by the DEP. We have reviewed this data for consistency and believe it to be reasonable and accurate. However, we have made no attempt to audit or verify this information. The accuracy of our results is dependent upon the accuracy and completeness of this underlying data. Therefore, any material discrepancies discovered in this data by DEP or its auditor should be reported to us and this report amended accordingly, if warranted. It is noted that some claims records were incomplete, particularly in some of the relevant date fields. This adds to the potential uncertainty associated with calculating estimates of the liabilities.

There is a limitation upon the accuracy of these estimates and projections in that there is an inherent uncertainty in any estimate of loss reserves and financial projections. This is due to the fact that the ultimate liability for claims is subject to the outcome of events yet to occur, e.g., the likelihood of claimants bringing suit, the size of awards, changes in the standards of liability, and the attitudes of claimants toward settlement of their claims. Also our financial projections are subject to a very high degree of uncertainty because they require prediction of future economic, legal, and judicial conditions which are not knowable. In our judgment, we have employed techniques and assumptions that are appropriate, and the conclusions presented herein are reasonable, given the information currently available. However, it should be recognized that future financial results will likely deviate, perhaps materially, from our estimates.

II. EXECUTIVE SUMMARY

The MSI Fund program is a well funded mechanism for providing mine subsidence insurance coverage for those consumers living in designated mine subsidence areas. Claims data is thin, but claims settle quickly once they are reported. Due to the unique nature of the coverage (low claim frequency) and the limitation on data, traditional development techniques for determining outstanding liabilities are not as reliable as in some other lines of insurance, but are necessary considering the lack of relevant external data and other applicable reserving techniques.

The current Premium Rates reflect a recently implemented significant rate reduction (over 25%) over rates that had otherwise been in use for a long time. The following analysis and recommendation call for an additional rate reduction that should help lead to increased penetration without having a negative impact on the financial integrity of the Fund.

Catastrophic potential was analyzed in our prior analysis leading to the conclusion that reinsurance was not needed at the time providing that the level of Fund surplus was maintained at an adequate level. We did not revisit the Catastrophe or reinsurance issues with this analysis.

The following points summarize our observations and recommendations.

- The MSI Fund is financially sound.
- The Fund's projected surplus can withstand significant catastrophic losses.
- A reduction in the Fund's surplus is not recommended at this time.
- A 17.3% premium reduction is recommended.
- The factor reserve per reported claims should be changed to \$3,600.
- No change is recommended to the \$500,000 coverage limit at this time.
- Consideration should be given to adding Additional Living Expense Coverage to the MSI Fund policies.

II. EXECUTIVE SUMMARY

• A range of Surplus to Coverage In Force benchmarks have been provided within the report.

III. FINANCIAL STATUS

The MSI Fund maintains a strong financial position, as is evidenced by past financial statements, and supported by this actuarial review. The Fund's projected surplus is sufficient to see it through several years of significant underwriting loss and even withstand significant catastrophic losses.

1. Outstanding Liabilities

In terms of claim obligations, it is estimated the Fund has an outstanding liability of \$480,000 to \$775,000, as developed on Exhibit 1. This estimate is derived from the paid claim file for the 1991 fiscal report year and subsequent as of December 31, 2011, provided by the DEP. Claims were aggregated on a Fiscal Report Year basis. A review was made of the relationship of the reporting pattern and the occurrence date. Adjustment factors, commonly referred to as Loss Development Factors, were estimated to account for unreported claims. It should be noted, that some of the occurrence dates were not always accurate, sometimes being later than the report date, incomplete, or inconsistently coded. In such cases logical assumptions were made to populate this field. Report date issues were not observed.

Mine Subsidence claims are generally considered to be of a high severity, low frequency nature, resulting in thin and volatile historical data. However, once a claim is reported, it generally is adjusted, paid, and settled quickly. There is little development on known claims. Development does exist for unknown claims. Incurred But Not Reported (IBNR) claims are the result of covered occurrences that have not been discovered, or at least have not been reported, or if reported, have not had a claim file established. For an average Fiscal Report Year approximately 12 to 24% of the claim liabilities are not yet reported as of the end of that year. This figure drops to 10 to 15% after the second year, and continues to decline toward zero. The longest reporting lag observed in the MSI paid data was 40 years, indicating a need for at least a modest tail factor for all Report Years not at least 40 years old. Since data was only provided back to the 1991 Fiscal Report Year, an estimate of the Prior Years' outstanding liabilities was made based on the

III. FINANCIAL STATUS

oldest of the data and the observed reporting pattern. We have assumed that there is a potential for 1 to 2% additional development after 40 years.

It is interesting to observe that the MSI financial statements have recently carried Liabilities for Outstanding Claims in amounts ranging from \$300,000 to \$600,000. It is not certain how these estimates are derived. They may be IBNR estimates, or they may represent known obligations on known claims that have simply not yet been paid.

2. Assets

The assets of the MSI Fund may generally be considered the funds available for investing as Furniture and Equipment make up less than 1% of MSI assets. MSI investable assets have grown strongly over the years, fueled by premium growth, low claim liabilities, and favorable investment rates of return. As of Fiscal Year ending 06/30/11, investable funds were just over \$86 million. Pinnacle has estimates the investable funds as of 06/30/12 to be \$90 million, matching the growth seen in the prior year, based on recent investment returns and the historically low number of claims that are paid annually.

3. Surplus

The required surplus level for an insurance entity is dependent on goals of the insuring entity, underlying nature of the risk being insured, and capital structure of the insurance entity. Surplus typically is equated with the net worth of the insurance entity and protects the viability of the insurance entity from extreme or unforeseen adverse events, allows entities to expand coverage, and is a source of income generated through investment activities. The ability of a company to raise capital also impacts how much surplus a company will hold in reserve. If a company has limited means to raise capital, more surplus will need to be held.

III. FINANCIAL STATUS

Property insurers generally cover short tail exposures with predictable severities and frequencies. When severities or frequencies are less predictable, greater surplus is then needed to cover the potential adverse results that can occur. When the property insured is subject to potential catastrophic loss risk increases. The level of held surplus should increase accordingly.

There are a number of considerations when evaluating the appropriate surplus level for the Pennsylvania Mine Subsidence Insurance Fund. Mine subsidence coverage is subject to low frequency; however it is possible that one natural event would impact multiple insureds, increasing frequency. Severity tends to be low in comparison to coverage purchased. However, the potential for total losses does exist and total losses do occur. Further, maximum policy limits restrict the level of loss to any one insured. These factors may mitigate the potential for a catastrophic mine subsidence loss, however the risk remains, requiring a higher surplus level. It is also noted that the Fund has recently doubled its maximum policy limit to \$500,000.

One of the primary sources of capital is underwriting income (premium excess of loss and expense.) In the past underwriting income has resulted in consistent increases to surplus; however a reduction in rates as recommended will decrease the level of underwriting income and mostly likely reduce the rate of increase in surplus. Also, the Pennsylvania Mine Subsidence Insurance Fund has limited ability to raise capital. As a government agency, the Fund could possibly borrow money, although this may not be a desirable situation.

In 1972 Hurricane Agnes caused localized flooding in the Wilkes-Barre region. The damages occurred when a levee on the West Bank of the Susquehanna River located across the river from Wilkes-Barre was breached. During the time that flood related claims were processed, from 1972 through 1975, there was a significant increase to the number of claims reported in the Anthracite Region. In 1971 there were 7 claims paid in the Anthracite Region. The paid claims jumped to 34 in 1974 before dropping back to 19 in 1976, when the last of the Agnes related

III. FINANCIAL STATUS

claims were paid. The potential for larger regions of flooding in the future does exist. As the Fund's penetration in the marketplace increases, exposure concentration will increase and exposure to catastrophic events from flooding or earthquake also increases.

One gauge of an appropriate surplus level is to review the surplus levels carried by other property insurance writers. Since, the Pennsylvania Mine Subsidence Insurance Fund covers only property a comparison of companies that write primarily property would be appropriate. Data was collected from A.M. Best on companies where property premium made up at least 80 percent of their total premium. Excerpts from that analysis are shown in the table below.

| Characteristic | Net Premium to Surplus Ratio | Implied MSIF Surplus |
|---|------------------------------------|-------------------------|
| Historic Benchmark (All Writers) | 2/1 | \$3,000,000 |
| Current Industry Trend (All Writers) | < 1/1 | \$6,700,000 |
| Industry Property Writers (2006-2010) | .85/1 | \$7,100,000 |
| Industry Property Writers (2010) | .75/1 | \$8,000,000 |
| Select Property (only) Reinsurers (2006-2010) | .51/1 | \$11,800,000 |
| Select Property (only) Reinsurers (2010) | .50/1 | \$12,000,000 |
| California Earthquake Authority (2006-2010) | .11/1 | \$54,500,000 |
| California Earthquake Authority (2011) | .15/1 | \$40,000,000 |

NET PREMIUM TO SURPLUS RATIOS ALL WRITERS AND PROPERTY DOMINANT WRITERS

III. FINANCIAL STATUS

The Fund's premium is approximately \$6 million annually. If a similar premium to surplus level as that held by the California Earthquake Authority (CEA), .15/1, then a surplus of approximately \$40 million (\$6,000,000/.15) would be required.

Consideration should also be given to the relationship of premium to coverage in force (CIF). It might be more appropriate to relate surplus levels to CIF as this benchmark is not subject to shifting rate levels, but is the true measure of exposure at risk and will capture the impact of any significant exposure growth in the Fund. The Fund's CIF at 06/30/11 was just over \$9 billion. A \$40 million dollar surplus translates to a surplus level of \$4.44 per \$1,000 of CIF. At June 30, 2011 the CEA's surplus per \$1,000 CIF was \$12.95. The same relationship for the

Pennsylvania Mine Subsidence Insurance Fund would imply a needed Fund surplus of \$116,600,000.

For ease of reference, various Surplus to (\$1,000) Coverage in Force are displayed in the following table.

| Benchmark | Implied MSIF Surplus | Surplus per \$1000 CIF |
|---|----------------------------|------------------------------|
| Select Property Reinsurers (Premium basis) | \$12,000,000 | \$1.33 |
| California Earthquake Authority (Premium basis) | \$40,000,000 | \$4.44 |
| California Earthquake Authority (CIF basis) | \$ 116,600,000 | \$12.95 |
| Pennsylvania MSI Fund (Current actual) | \$86,740,060 | \$9.64 |
| Pennsylvania MSI Fund (Current formula) | | \$7.43 |

NET SURPLUS TO \$1000 COVERAGE IN FORCE RATIOS

III. FINANCIAL STATUS

| Benchmark | Implied MSIF Surplus | Surplus per \$1000 CIF |
|-------------------------------------|----------------------------|------------------------------|
| Recommended MSI Fund Benchmark Low | | \$4.44 |
| Recommended MSI Fund Benchmark High | | \$12.95 |

NET SURPLUS TO \$1000 COVERAGE IN FORCE RATIOS

While the CEA has different coverages (contents, loss of use, etc) the risk exposure on Fund assets may be thought of as being similar. Frequencies and severities will also differ between the CEA and mine subsidence. In establishing benchmarks for surplus levels, the Fund should consider all the various points above, including its appetite for risk. We have recommended benchmarks closely associated with those developed from the analysis of the California Earthquake Authority because of some of the similarities between the programs (property coverage, catastrophic potential in terms of frequency and severity).

4. Cash Flow

Exhibit 2 displays the Fund's estimated cash flow for the next 10 fiscal years. At the end of 10 years it is estimated that the Fund's ending balance will be over \$200 million if no change is made to the premium rates.

Several factors go into the cash flow analysis, including estimated premium growth and refunds, paid commissions, investment income, paid losses, and administrative expense. Exhibit 3 shows the development of the various growth rates applied within the cash flow analysis. Premium rates have not changed for some time. The relation of premium to Coverage in Force (CIF) has recently been declining significantly, reflecting premium reductions and the availability of increased coverage at lower costs per dollar of coverage. For our cash flow estimates, a figure

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of 60 cents per \$1,000 of coverage was selected and held constant to project each of the next 10 years. In addition, premium refunds have been consistently running at about 0.5% per \$1,000 of CIF.

For premium, and many of the other cash flow parameters, projected CIF figures were developed. Many of the cash flow parameters have very consistent relationships with CIF. Losses and Administrative Expenses are the notable exceptions.

The historic annual growth of Coverage In Force was reviewed, along with the growth of Policies In Force and Inflationary Trends. These latter two items are what might be considered the primary drivers of CIF growth. Annual changes of 1.25% and 3.35% were selected for Policy growth and Inflation, respectively. (See Exhibit 3.) However, even after accounting for Policy Growth and Coverage Inflation, there is still a significant residual effect from other unknown factors. The historic pattern of these other factors was also considered in establishing a CIF growth rate. In the end, 6.24% CIF annual growth was selected. Exhibit 3 displays the detail of the above discussion.

Commissions are a relatively new phenomenon and are related to outside producers writing coverage for the MSI program. Currently the MSI pays 50% of the first year premium for an outside producer writing an MSI program policy. The most recent Operational Performance report shows Paid Commissions is 0.9% of the CIF, after reaching a high of 3.0% in 2005. See Exhibit 3. For the cash flow analysis the Commission rate to CIF was set at 1.0%.

Investment return rates have grown steadily over the past few years. The average return for Fiscal Year ending 06/30/11 was 11.5%, but the average has been much lower over recent history. For the future cash flow analysis the return was selected to be a constant 5.50%, which is close to the average over the last five years. We have also projected cash flows using a 4%

III. FINANCIAL STATUS

average return which is less than what the Fund has earned on average, but not so in some recent years, or the financial community in general for some time.

Even though the relationship of Paid Loss to CIF has not been consistent, a long term average ratio was selected for future projections. The lack of consistency on a year-to-year basis has nothing to do with the CIF itself, and the CIF is a very reliable measure of exposure. Taking a long term average of a high severity/low frequency exposure is a common actuarial practice and is often used in establishing catastrophe loads. One can not predict, with any kind of certainty, the annual number of catastrophes or the number of mine collapses resulting in insured loss, or the severity of those losses. Using a long term average applied to the stable CIF allows a good means of bringing in total expected mine subsidence losses in a smooth process, although it does not account for the annual fluctuation that is apparent when reviewing the historic patterns in Exhibit 3. For the cash flow analysis we have selected a long term average ratio to CIF of 12.4%.

The last parameter reviewed in the cash flow analysis was Administrative Expense. Unlike many of the other parameters, Administrative Expense is not directly proportional to CIF. Many expenses are fixed in nature, while others can dramatically increase or decrease regardless of the CIF levels. Over the last 15 fiscal years Administrative Expenses have grown from \$1.2 million to \$1.9 million, in a notably fluctuating manner. See the historic detail in Exhibit 3, column 15. For this analysis, an annual expense growth rate of 4.0% was selected and applied consistently to each new year. A starting expense of \$2.0 million was selected for Fiscal Year ending 06/30/13.

A second scenario was modeled in the cash flow analysis. The only difference from what has been discussed above is a premium rate reduction of 17% was incorporated, effective 07/01/12. As can be seen in Exhibit 2, this change brought the Fund's estimated ending balance down to \$185 million as of 06/30/22.

III. FINANCIAL STATUS

Finally, both of the above scenarios were run again, but this time selecting an investment rate of return of 4.00% as a more conservative measure. As can be seen in Exhibit 2, this change brought the Fund's estimated ending balance down to \$176 million as of 06/30/22, assuming no premium rate reduction. With a 17% premium rate reduction, the 4.00% rate of return assumptions brings the projected ending balance down to \$161 million as of 06/30/22. See Exhibit 2.

5. Immediate and Future Status of MSI Fund

Exhibit 2 summarizes the various elements that make up the Fund adjustments and the resulting estimated Fund balance for each of the next 10 Fiscal Years.

IV. PREMIUM RATES

1. Overall Premium Levels

The current premium rate levels have adequately funded the MSI program for some years to come. An indicated premium adjustment is developed in Exhibit 4. Many of the parameters in Exhibit 4 were developed in Exhibit 3. The rate indication methodology employed is referred to as a loss ratio approach. Under this approach, the estimated future loss plus non-premium variable expense is divided by the estimated premium less premium variable expense plus investment income.

Generally, an adjustment for profit and contingencies is included in the denominator of the indications calculation. While this was not done explicitly in this case, as a conservative measure, an allowance for the fluctuating amount of losses was included in the calculation. This allowance was set equal to the average incurred loss (average paid loss plus average loss reserve). A review of exhibit 3 shows that the paid loss amount (as a percent of Coverage In Force), was at about double the selected long term average in three years. Many years were well below the 12.4% selected average. By basically doubling the average expected loss we have accounted for a recurrence of the most extreme loss in the data period under review without having to consider a rate increase. The surplus increase that will be generated in most years should comfortably add to the amount of funds available to cover the improbable catastrophe loss.

The overall premium indicated rate level change is for a 62% decrease.

An overall premium rate level decrease of 17.33% is proposed, a summary of which can be found in Exhibit 5. Parts of this proposed decrease are discussed in the following sections. A larger decrease is not suggested at this time for conservative reasons, to mitigate market disruptions, and in recognition of the fact that a significant portion of the indicated decrease is driven by the investment income generated from surplus.

IV. PREMIUM RATES

2. Residential and Non-Residential Premium Rates

Non-Residential Premium Rates are currently two times the Residential Premium Rates. When these rate differentials were first established with non-residential at four times the residential rate levels, consideration may have been given to intuitive factors such as types of construction and their susceptibility to damage in the event of a mine subsidence, predominant location of each type of structure, affordability to each type of purchaser, the differential for other property perils, and the likelihood of submitting a claim for minor damage. The combination of the above factors could lead to an assumed rate differential as is currently in place.

When the differentials were established there was no direct historic evidence to support the selected implied relationships. Even now the amount of Non-Residential claim experience is negligible, perhaps indicating the reluctance of consumers to buy the non-residential coverage at the split rates.

In our last analysis we recommended cutting the rate differential from 4.0 to 2.0. With this analysis it is recommended that the Non-Residential Premiums be established at the same level as the residential premiums.

The base rate decrease, combined with the change to the surcharge methodology, leads to an approximate premium decrease of 50 to 58% for Non-Residential risks. (See Exhibit 5.) While this is a significant decrease for these risks, it should be kept in mind that the current size of the Non-Residential book is minor in relationship to the Residential book. This change should also lead to increased penetration in the Non-Residential category, which may then encourage further penetration in the Residential category.

IV. PREMIUM RATES

3. Charges for the Initial Amount of Coverage

In addition to the Non-Residential surcharge, some policyholders have expressed dissatisfaction with the basic rate level for low-cost housing. The purpose of the higher rate charge for the initial amount of coverage is to equitably share some of the fixed costs of providing this coverage. A review of the claims file provided to Pinnacle continues to support higher rate levels for the initial coverage. See Exhibits 6 and 7 for a sampling of some of the claims characteristics.

Higher charges for the initial amounts of coverage are intuitive from a claims perspective. As in other property insurance, most losses are not total losses or total limits losses. Nearly 30% of the Pennsylvania claims are for less than \$10,000. Decreasing rate levels for increasing coverage is a well documented standard for property insurance.

Be that as it may, it still does not address the affordability issue that is probably driving this concern. The overall rate decrease will help this in some regard. A uniform rate per coverage dollar regardless of the coverage amount would be easy to understand, less prone to error, and make the cost for low-cost housing policyholders more affordable. While it is financially possible to lower the basic charges for the initial coverage even further than is recommended at this time, doing so is left to the discretion of the MSI.

4. Program Growth

The MSI desires to increase its penetration in the available marketplace, thus lowering costs and providing a needed service to Pennsylvania consumers. Currently less than 5% of the available market is insured. The above changes should stimulate growth, especially in the Non-Residential category. Advertising these changes will also help, if it is deemed to be cost effective. Notification of changes to Producers will already be required. Getting some free press should also be easy to do.

V. RESERVES FOR OUTSTANDING CLAIMS

Exhibit 8 develops the estimated trended ultimate average claim. This estimate is used in Exhibit 7 to develop some claim benchmarks by Layer of Coverage and Exhibit 9 to develop a factor reserve per reported claim. The reserves for known claims would be set equal to the benchmark ultimate claim (\$45,000) less any payments made to date.

Based on the relationship of paid claim counts to reported claim counts as detailed in Exhibit 9, a factor reserve of \$3,600 per reported claim regardless of mine type is recommended.

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VI. COVERAGE LIMITS

Currently the Fund offers coverage limits up to \$500,000. Exhibit 7 displays claims activity on Paid Claims, broken down into a claim range within an amount of purchased coverage range. On the Summary page of Exhibit 7 it can be seen that on average, paid claims tend to settle for about 19.2% of the coverage amount purchased. As the amount of coverage purchased increases, the relationship of the settlement to purchased coverage tends to decrease. This is not only intuitive, but supported by the Detail in Exhibit 7 which shows that smaller claims tend to be more prevalent regardless of the amount of coverage purchased. Exhibit 6 restates these same numbers, but summarized on a range of claims size basis. In this exhibit it can also be seen that claims at or below \$100,000 make up the majority of claims payments.

The MSI Fund has about 4,300 policies with the maximum limit of \$500,000, or a little less than 10% of total policies. Given that the Fund just began offering this coverage in 2010, and given the remote possibility of multiple claims from a single occurrence, no further adjustments are recommended at this time. After there has been an opportunity to develop more experience at these upper coverage limits layers, higher coverage limits should be reviewed again to see if additional adjustments are warranted.

Additional Living Expense Coverage is not currently offered by the Fund. This particular coverage is offered by the private market to similar risks that are written by the MSI Fund. Also in 2010, Additional Living Expense Coverage of up to \$25,000 was added to all residential policies at no additional charge to the policyholders of the Kentucky Mine Subsidence Insurance Fund. The Pennsylvania MSI Fund may wish to consider adding this coverage option to its policies for competitive, policyholder welfare, and public perception reasons. With its current surplus position, the Fund could offer or automatically provide this coverage at no additional charge.

VII. CONCLUDING REMARKS

In wrapping up our study, the following observations and recommendations are made:

- The MSI Fund is financially sound.
- The Fund's projected surplus is sufficient to see it through several years of significant underwriting loss and even withstand significant catastrophic losses.
- A reduction in surplus is not recommended at this time. Rather, changes noted below are recommended and their impacts observed before lowering the surplus.
- A 17.3% Premium reduction is recommended. This includes reducing residential base rates 16.7%, reducing non-residential base rates 58.3%, and reducing initial coverage on non-residential rates by 50.0%.
- The factor reserve per reported claims should be changed to \$3,600 for both Bituminous and Anthracite mine subsidence claims.
- No change is recommended to the \$500,000 coverage limit at this time.
- Consideration should be given to offering Additional Living Expense Coverage.
- A range of Surplus to Coverage In Force benchmarks have been provided within the report.

It has been a pleasure working with the DEP to develop this analysis and resulting recommendations. Pinnacle remains available to further discuss this analysis or add to it if so desired by the DEP.

| | Pennsylvania Mine Subsidence Insurance Fund 2011 Actuarial Review |
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11 Net Premium to Surplus Ratios

| | Pennsylvania Mine Subsidence Insurance Fund 2011 Actuarial Review | | | | | | | | | | |
|---|--|-----------------|------------|-----------------|------------|-------------------|-----------------|--|--|--|--|
| Estimated Outstanding Liabilities as of 12/31/2011 | | | | | | | | | | | |
| Fiscal | Paid | | | | | | | | | | |
| Report Year | Claim | Amount Ultimate | Adjustment | Estimated Ultim | ate Amount | Estimated Outstar | nding Liability | | | | |
| Beginning 7/1 | Amount | Low | High | Low | High | Low | High | | | | |
| (1) | (2) | (3a) | (3b) | (4a) | (4b) | (5a) | (5b) | | | | |
| Prior | | | | | | 80,000 | 130,000 | | | | |
| 1991 | 1,415,693 | 1.014 | 1.024 | 1,435,578 | 1,449,792 | 19,885 | 34,099 | | | | |
| 1992 | 1,012,866 | 1.014 | 1.024 | 1,027,207 | 1,037,377 | 14,341 | 24,511 | | | | |
| 1993 | 1,279,515 | 1.014 | 1.024 | 1,297,776 | 1,310,625 | 18,260 | 31,110 | | | | |
| 1994 | 744,356 | 1.014 | 1.024 | 755,063 | 762,538 | 10,707 | 18,183 | | | | |
| 1995 | 973,174 | 1.014 | 1.025 | 987,282 | 997,057 | 14,108 | 23,883 | | | | |
| 1996 | 602,438 | 1.015 | 1.025 | 611,240 | 617,291 | 8,801 | 14,853 | | | | |
| 1997 | 406,461 | 1.015 | 1.025 | 412,445 | 416,529 | 5,984 | 10,068 | | | | |
| 1998 | 513,075 | 1.015 | 1.025 | 520,686 | 525,842 | 7,611 | 12,767 | | | | |
| 1999 | 503,114 | 1.015 | 1.025 | 510,634 | 515,690 | 7,520 | 12,576 | | | | |
| 2000 | 332,401 | 1.016 | 1.026 | 337,575 | 340,918 | 5,175 | 8,517 | | | | |
| 2001 | 497,757 | 1.017 | 1.027 | 506,011 | 511,021 | 8,254 | 13,264 | | | | |
| 2002 | 1,341,643 | 1.018 | 1.028 | 1,365,256 | 1,378,773 | 23,613 | 37,130 | | | | |
| 2003 | 160,478 | 1.019 | 1.029 | 163,466 | 165,084 | 2,988 | 4,606 | | | | |
| 2004 | 246,683 | 1.020 | 1.030 | 251,527 | 254,018 | 4,844 | 7,334 | | | | |
| 2005 | 1,169,872 | 1.021 | 1.031 | 1,194,036 | 1,205,858 | 24,164 | 35,987 | | | | |
| 2006 | 502,142 | 1.024 | 1.034 | 514,052 | 519,142 | 11,910 | 17,000 | | | | |
| 2007 | 506,439 | 1.037 | 1.049 | 524,941 | 531,451 | 18,502 | 25,012 | | | | |
| 2008 | 1,107,071 | 1.057 | 1.081 | 1,170,467 | 1,196,671 | 63,396 | 89,600 | | | | |
| 2009 | 462,082 | 1.081 | 1.127 | 499,547 | 520,773 | 37,465 | 58,691 | | | | |
| 2010 | 837,510 | 1.111 | 1.198 | 930,341 | 1,003,165 | 92,832 | 165,656 | | | | |
| Total | 14,614,770 | | | 15,015,132 | 15,259,616 | 480,362 | 774,846 | | | | |

<u>Notes:</u> (2) (3)

Provided by MSI. 1991 - 1996 from prior analysis Exhibit 10 - cumulative settlement amount factors

(4) (5)

(2) x (3)
(4) - (2), Prior based on subsequent 5 year average extended for 5 years

| | Pennsylvania Mine Subsidence Insurance Fund 2011 Actuarial Review Projected Cash Flow Assuming No Change in Premium Rates | | | | | | | | | | | |
|---------------|--|-------------|-----------|------------|---------|------------|-----------|----------------|-------------|--|--|--|
| | | | | | | | | | | | | |
| Fiscal | Coverage | | Assum | | | | | | | | | |
| Report Year | In Force | Beginning | | Paid | Premium | Investment | Paid | Administrative | Ending | | | |
| Beginning 7/1 | in \$ (000's) | Balance | Premium | Commission | Refund | Income | Loss | Expense | Balance | | | |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | | | |
| 2010 | 9,001,630 | | | | | | | | 86,740,060 | | | |
| 2011 | 9,001,630 | 86,740,060 | | | | | | | 90,000,000 | | | |
| 2012 | 9,563,431 | 90,000,000 | 5,738,059 | 95,634 | 43,460 | 5,154,355 | 1,184,290 | 2,000,000 | 97,569,029 | | | |
| 2013 | 10,160,295 | 97,569,029 | 6,096,177 | 101,603 | 46,173 | 5,587,593 | 1,258,203 | 2,081,097 | 105,765,723 | | | |
| 2014 | 10,794,410 | 105,765,723 | 6,476,646 | 107,944 | 49,055 | 6,056,696 | 1,336,729 | 2,165,483 | 114,639,855 | | | |
| 2015 | 11,468,101 | 114,639,855 | 6,880,861 | 114,681 | 52,116 | 6,564,501 | 1,420,155 | 2,253,290 | 124,244,975 | | | |
| 2016 | 12,183,837 | 124,244,975 | 7,310,302 | 121,838 | 55,369 | 7,114,065 | 1,508,789 | 2,344,657 | 134,638,689 | | | |
| 2017 | 12,944,244 | 134,638,689 | 7,766,546 | 129,442 | 58,824 | 7,708,672 | 1,602,954 | 2,439,730 | 145,882,956 | | | |
| 2018 | 13,752,108 | 145,882,956 | 8,251,265 | 137,521 | 62,496 | 8,351,855 | 1,702,996 | 2,538,657 | 158,044,406 | | | |
| 2019 | 14,610,391 | 158,044,406 | 8,766,235 | 146,104 | 66,396 | 9,047,416 | 1,809,282 | 2,641,596 | 171,194,679 | | | |
| 2020 | 15,522,242 | 171,194,679 | 9,313,345 | 155,222 | 70,540 | 9,799,438 | 1,922,201 | 2,748,709 | 185,410,790 | | | |
| 2021 | 16,491,001 | 185,410,790 | 9,894,601 | 164,910 | 74,942 | 10,612,313 | 2,042,167 | 2,860,165 | 200,775,518 | | | |

Notes: (2)

Reflects Average Annual Change developed in Exhibit 3 Col (3)

(3)

Prior Year Ending Balance (2) x Selected Premium Rate developed in Exhibit 3 Col (9) (4)

(2) x Selected Commission Rate and Increment developed in Exhibit 3 Col (12), capped at 7.5%
(2) x Selected Premium Refund Rate developed in Exhibit 3 Col (19) (5)

(6)

(7) (8) Based on a Selected Investment Rate of 5.50%

(2) x Selected Paid Loss Rate developed in Exhibit 3 Col (14)

Reflects Average Annual Change developed in Exhibit 3 Col (14) (3) + (4) - (5) - (6) + (7) - (8) - (9)(9) (10)

| | Pennsylvania Mine Subsidence Insurance Fund 2011 Actuarial Review Projected Cash Flow Assuming a Rate Reduction of -17.33% | | | | | | | | | | | |
|--|---|----------------------|--------------------------------------|--------------------|-------------------|----------------------|--------------|---------------------------|--------------------------|--|--|--|
| | | | | | | | | | | | | |
| Fiscal Report Year Beginning 7/1 | Coverage In Force in \$ (000's) | Beginning Balance | Premium with change of -17.33% | Paid Commission | Premium Refund | Investment Income | Paid Loss | Administrative Expense | Ending Balance | | | |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | | | |
| 2010 2011 | 9,001,630 9,001,630 | 86,740,060 | | | | | | | 86,740,060 90,000,000 | | | |
| 2012 | 9,563,431 | 90,000,000 | 5,240,856 | 83,680 | 38,028 | 5,140,797 | 1,184,290 | 2,000,000 | 97,075,655 | | | |
| 2013 | 10,160,295 | 97,075,655 | 5,039,710 | 76,202 | 34,630 | 5,530,903 | 1,258,203 | 2,081,097 | 104,196,136 | | | |
| 2014 | 10,794,410 | 104,196,136 | 5,354,243 | 80,958 | 36,791 | 5,937,388 | 1,336,729 | 2,165,483 | 111,867,808 | | | |
| 2015 | 11,468,101 | 111,867,808 | 5,688,407 | 86,011 | 39,087 | 6,375,330 | 1,420,155 | 2,253,290 | 120,133,003 | | | |
| 2016 | 12,183,837 | 120,133,003 | 6,043,427 | 91,379 | 41,527 | 6,847,142 | 1,508,789 | 2,344,657 | 129,037,220 | | | |
| 2017 | 12,944,244 | 129,037,220 | 6,420,604 | 97,082 | 44,118 | 7,355,417 | 1,602,954 | 2,439,730 | 138,629,357 | | | |
| 2018 | 13,752,108 | 138,629,357 | 6,821,320 | 103,141 | 46,872 | 7,902,944 | 1,702,996 | 2,538,657 | 148,961,956 | | | |
| 2019 | 14,610,391 | 148,961,956 | 7,247,046 | 109,578 | 49,797 | 8,492,718 | 1,809,282 | 2,641,596 | 160,091,468 | | | |
| 2020 | 15,522,242 | 160,091,468 | 7,699,342 | 116,417 | 52,905 | 9,127,957 | 1,922,201 | 2,748,709 | 172,078,535 | | | |
| 2021 | 16,491,001 | 172,078,535 | 8,179,866 | 123,683 | 56,207 | 9,812,116 | 2,042,167 | 2,860,165 | 184,988,296 | | | |

Notes:

Reflects Average Annual Change developed in Exhibit 3 Col (3) (2)

(3) Prior Year Ending Balance

(2) x Selected Premium Rate developed in Exhibit 3 Col (9) x (1 + -17.33%) (4)

(2) x Selected Commission Rate and Increment developed in Exhibit 3 Col (12), capped at 7.5% x 25% for yrs 2013 - 2021 (a 12.5% Reduction in yr 2012)
(2) x Selected Premium Refund Rate developed in Exhibit 3 Col (19) x 25% for years 2013 - 2021 (a 12.5% Reduction in year 2012) (5) (6)

(7) (8) Based on a Selected Investment Rate of 5.50%

(2) x Selected Paid Loss Rate developed in Exhibit 3 Col (14)

Reflects Average Annual Change developed in Exhibit 3 Col (14) (3) + (4) - (5) - (6) + (7) - (8) - (9)

(9) (10)

| | Pennsylvania Mine Subsidence Insurance Fund 2011 Actuarial Review Projected Cash Flow Assuming No Change in Premium Rates and a 4.00% Rate of Return on Investments | | | | | | | | | | | |
|--|--|----------------------|-----------|--------------------|-------------------|----------------------|--------------|---------------------------|------------------------|--|--|--|
| Fiscal Report Year Beginning 7/1 | Coverage In Force in \$ (000's) | Beginning Balance | Premium | Paid Commission | Premium Refund | Investment Income | Paid Loss | Administrative Expense | Ending Balance | | | |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | | | |
| 2010 2011 | 9,001,630 9,001,630 | 86,740,060 | | | | | | | 86,740,06 90,000,00 | | | |
| 2012 | 9,563,431 | 90,000,000 | 5,738,059 | 95,634 | 43,460 | 3,721,259 | 1,184,290 | 2,000,000 | 96,135,93 | | | |
| 2013 | 10,160,295 | 96,135,933 | 6,096,177 | 101,603 | 46,173 | 3,975,572 | 1,258,203 | 2,081,097 | 102,720,60 | | | |
| 2014 | 10,794,410 | 102,720,607 | 6,476,646 | 107,944 | 49,055 | 4,248,476 | 1,336,729 | 2,165,483 | 109,786,51 | | | |
| 2015 | 11,468,101 | 109,786,519 | 6,880,861 | 114,681 | 52,116 | 4,541,319 | 1,420,155 | 2,253,290 | 117,368,45 | | | |
| 2016 | 12,183,837 | 117,368,457 | 7,310,302 | 121,838 | 55,369 | 4,855,538 | 1,508,789 | 2,344,657 | 125,503,64 | | | |
| 2017 | 12,944,244 | 125,503,644 | 7,766,546 | 129,442 | 58,824 | 5,192,675 | 1,602,954 | 2,439,730 | 134,231,91 | | | |
| 2018 | 13,752,108 | 134,231,914 | 8,251,265 | 137,521 | 62,496 | 5,554,378 | 1,702,996 | 2,538,657 | 143,595,88 | | | |
| 2019 | 14,610,391 | 143,595,887 | 8,766,235 | 146,104 | 66,396 | 5,942,410 | 1,809,282 | 2,641,596 | 153,641,1 | | | |
| 2020 | 15,522,242 | 153,641,154 | 9,313,345 | 155,222 | 70,540 | 6,358,659 | 1,922,201 | 2,748,709 | 164,416,48 | | | |
| 2021 | 16,491,001 | 164,416,486 | 9,894,601 | 164,910 | 74,942 | 6,805,142 | 2,042,167 | 2,860,165 | 175,974,04 | | | |

Notes: (2) (3) (4) (5)

Reflects Average Annual Change developed in Exhibit 3 Col (3)

Prior Year Ending Balance

(2) x Selected Premium Rate developed in Exhibit 3 Col (9)
(2) x Selected Commission Rate and Increment developed in Exhibit 3 Col (12), capped at 7.5%

(2) x Selected Premium Refund Rate developed in Exhibit 3 Col (19) (6)

(7)

Based on a Selected Investment Rate of 4.00%
(2) x Selected Paid Loss Rate developed in Exhibit 3 Col (14) (8)

Reflects Average Annual Change developed in Exhibit 3 Col (16) (9)

(10) (3) + (4) - (5) - (6) + (7) - (8) - (9)

| | | | Pennsylva | nia Mine Subs 2011 Actuar | | ance Fund | | | | | | |
|--|---|----------------------|--------------------------------------|------------------------------|-------------------|----------------------|--------------|---------------------------|------------------------|--|--|--|
| | Projected Cash Flow Assuming a Rate Reduction of -17.33% and a 4.00% Rate of Return on Investments | | | | | | | | | | | |
| Fiscal Report Year Beginning 7/1 | Coverage In Force in \$ (000's) | Beginning Balance | Premium with change of -17.33% | Paid Commission | Premium Refund | Investment Income | Paid Loss | Administrative Expense | Ending Balance | | | |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | | | |
| 2010 2011 | 9,001,630 9,001,630 | 86,740,060 | | | | | | | 86,740,06 90,000,00 | | | |
| 2012 | 9,563,431 | 90,000,000 | 5,240,856 | 83,680 | 38,028 | 3,711,471 | 1,184,290 | 2,000,000 | 95,646,32 | | | |
| 2013 | 10,160,295 | 95,646,329 | 5,039,710 | 76,202 | 34,630 | 3,934,798 | 1,258,203 | 2,081,097 | 101,170,70 | | | |
| 2014 | 10,794,410 | 101,170,705 | 5,354,243 | 80,958 | 36,791 | 4,163,144 | 1,336,729 | 2,165,483 | 107,068,13 | | | |
| 2015 | 11,468,101 | 107,068,132 | 5,688,407 | 86,011 | 39,087 | 4,406,933 | 1,420,155 | 2,253,290 | 113,364,93 | | | |
| 2016 | 12,183,837 | 113,364,930 | 6,043,427 | 91,379 | 41,527 | 4,667,253 | 1,508,789 | 2,344,657 | 120,089,25 | | | |
| 2017 | 12,944,244 | 120,089,259 | 6,420,604 | 97,082 | 44,118 | 4,945,271 | 1,602,954 | 2,439,730 | 127,271,25 | | | |
| 2018 | 13,752,108 | 127,271,250 | 6,821,320 | 103,141 | 46,872 | 5,242,232 | 1,702,996 | 2,538,657 | 134,943,13 | | | |
| 2019 | 14,610,391 | 134,943,136 | 7,247,046 | 109,578 | 49,797 | 5,559,471 | 1,809,282 | 2,641,596 | 143,139,40 | | | |
| 2020 | 15,522,242 | 143,139,400 | 7,699,342 | 116,417 | 52,905 | 5,898,413 | 1,922,201 | 2,748,709 | 151,896,92 | | | |
| 2021 | 16,491,001 | 151,896,924 | 8,179,866 | 123,683 | 56,207 | 6,260,586 | 2,042,167 | 2,860,165 | 161,255,15 | | | |

Notes:

Reflects Average Annual Change developed in Exhibit 3 Col (3) (2)

Prior Year Ending Balance

(3) (4) (5) (2) x Selected Premium Rate developed in Exhibit 3 Col (9) x (1 + -17.33%)
(2) x Selected Commission Rate and Increment developed in Exhibit 3 Col (12), capped at 7.5% x 25% for yrs 2013 - 2021 (a 12.5% Reduction in yr 2012) (2) x Selected Premium Refund Rate developed in Exhibit 3 Col (19) x 25% for years 2013 - 2021 (a 12.5% Reduction in year 2012) (6)

(7) Based on a Selected Investment Rate of 4.00%

(2) x Selected Paid Loss Rate developed in Exhibit 3 Col (14) (8)

Reflects Average Annual Change developed in Exhibit 3 Col (16) (9)

(10) (3) + (4) - (5) - (6) + (7) - (8) - (9)

Pennsylvania Mine Subsidence Insurance Fund 2011 Actuarial Review

Historic Coverage In Force and Other Parameters

| Fiscal | Coverage | Coverage | | Policies | Coverage Per | Estimated | | Average | Average |
|-----------------|---------------|----------|----------|----------|--------------|-----------|----------|-----------------|------------|
| Report Year | In Force | Annual | Policies | Annual | Policy | Inflation | Residual | Premium per | Investment |
| Beginning 7/1 | in \$ (000's) | Change | In Force | Change | Change | Change | Change | \$1000 Coverage | Rates |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) |
| 1996 | 3,478,793 | | 43,589 | | | | | 1.10 | |
| 1997 | 3,640,974 | 4.66% | 44,319 | 1.67% | 2.94% | 0.87% | 2.05% | 1.06 | |
| 1998 | 3,746,272 | 2.89% | 44,574 | 0.58% | 2.30% | 0.62% | 1.67% | 1.09 | |
| 1999 | 3,945,403 | 5.32% | 45,420 | 1.90% | 3.35% | 2.05% | 1.28% | 1.06 | |
| 2000 | 4,754,237 | 20.50% | 52,395 | 15.36% | 4.46% | 3.18% | 1.24% | 0.93 | |
| 2001 | 4,950,738 | 4.13% | 53,309 | 1.74% | 2.35% | 1.94% | 0.40% | 0.93 | |
| 2002 | 5,134,789 | 3.72% | 53,280 | -0.05% | 3.77% | 2.26% | 1.49% | 0.97 | 4.38% |
| 2003 | 5,484,411 | 6.81% | 53,487 | 0.39% | 6.40% | 4.74% | 1.58% | 0.92 | 3.73% |
| 2004 | 5,972,256 | 8.90% | 54,749 | 2.36% | 6.39% | 6.96% | -0.54% | 0.92 | 4.41% |
| 2005 | 6,728,380 | 12.66% | 56,567 | 3.32% | 9.04% | 3.57% | 5.28% | 0.92 | 5.83% |
| 2006 | 7,372,360 | 9.57% | 57,314 | 1.32% | 8.14% | 7.76% | 0.36% | 0.89 | 8.50% |
| 2007 | 7,680,300 | 4.18% | 57,558 | 0.43% | 3.74% | 6.57% | -2.66% | 0.83 | 0.22% |
| 2008 | 8,158,710 | 6.23% | 58,177 | 1.08% | 5.10% | 3.17% | 1.87% | 0.77 | -1.62% |
| 2009 | 8,663,940 | 6.19% | 57,774 | -0.69% | 6.93% | 0.94% | 5.94% | 0.60 | 8.85% |
| 2010 | 9,001,630 | 3.90% | 57,856 | 0.14% | 3.75% | 2.25% | 1.47% | 0.55 | 11.50% |
| Average | | 7.12% | | 2.11% | | 3.35% | 1.53% | 0.90 | 5.09% |
| Prior 2007 Sele | cted | 6.93% | | 1.49% | | 3.70% | 1.61% | 0.92 | 5.50% |
| Selected | | 6.24% | | 1.25% | | 3.35% | 1.53% | 0.60 | 5.50% |

| Fiscal Report Year | Paid | Commssion Rate per | Paid | Paid Loss Rate per | Administrative | Expense Annual | Expense Rate per | Premium | Refund Rate per |
|-----------------------|------------|-----------------------|-----------|-----------------------|----------------|-------------------|---------------------|---------|--------------------|
| | | | | | | | | | |
| -5 5 | Commission | \$1000 Coverage | Loss | \$1000 Coverage | Expense | Change | \$1000 Coverage | | \$1000 Coverage |
| (1) | (11) | (12) | (13) | (14) | (15) | (16) | (17) | (18) | (19) |
| 1996 | | | 891,182 | 25.62% | 1,238,671 | | 35.61% | 12,765 | 0.37% |
| 1997 | | | 727,549 | 19.98% | 1,363,026 | 10.04% | 37.44% | 18,642 | 0.51% |
| 1998 | | | 513,075 | 13.70% | 1,399,249 | 2.66% | 37.35% | 17,862 | 0.48% |
| 1999 | | | 503,114 | 12.75% | 1,779,486 | 27.17% | 45.10% | 19,568 | 0.50% |
| 2000 | | | 332,401 | 6.99% | 1,853,614 | 4.17% | 38.99% | 19,206 | 0.40% |
| 2001 | | | 481,786 | 9.73% | 1,585,883 | -14.44% | 32.03% | 17,185 | 0.35% |
| 2002 | | | 1,415,945 | 27.58% | 1,834,257 | 15.66% | 35.72% | 23,289 | 0.45% |
| 2003 | 67,446 | 1.23% | 160,478 | 2.93% | 1,808,099 | -1.43% | 32.97% | 24,462 | 0.45% |
| 2004 | 124,767 | 2.09% | 246,683 | 4.13% | 1,583,470 | -12.42% | 26.51% | 33,165 | 0.56% |
| 2005 | 201,525 | 3.00% | 1,522,531 | 22.63% | 1,881,931 | 18.85% | 27.97% | 41,035 | 0.61% |
| 2006 | 166,026 | 2.25% | 776,796 | 10.54% | 2,208,894 | 17.37% | 29.96% | 38,571 | 0.52% |
| 2007 | 152,481 | 1.99% | 506,439 | 6.59% | 2,332,823 | 5.61% | 30.37% | 57,967 | 0.75% |
| 2008 | 118,961 | 1.46% | 1,107,071 | 13.57% | 2,124,639 | -8.92% | 26.04% | 36,540 | 0.45% |
| 2009 | 92,609 | 1.07% | 462,082 | 5.33% | 1,743,476 | -17.94% | 20.12% | 36,709 | 0.42% |
| 2010 | 84,396 | 0.94% | 332,024 | 3.69% | 1,924,696 | 10.39% | 21.38% | -38 | 0.00% |
| Average | | 1.75% | | 12.38% | | 4.05% | 31.84% | | 0.45% |
| Prior 2007 Select | ted | 4.00% | | 12.35% | | 5.00% | 28.00% | | 0.50% |
| Selected | | 1.00% | | 12.38% | | 4.05% | 22.50% | | 0.45% |
| Annual Incremen | ıt | 0.00% | | | | | | | |

** 27.9% rate reduction ** 13.7% premium distribution and \$500K Limit introduced

| Notes: | |
|--------|---|
| (2) | MSI 2011 board report and prior board reports |

- (2) (3) (4) (5)
- (2) / Prior (2) MSI 2011 board report and prior board reports
- (4) / Prior (4)
- [1 + (3)] / (1+ (5)] 1 Provided by MSI (6)
- (7)
- (8) [1 + (6)] / (1+ (7)] - 1

(9) MSI 2011 board report and prior board reports

(10) MSI 2011 board report and prior board reports

- (11) MSI 2011 board report and prior board reports (12)
 - (11) / (2)

(13)

- MSI 2011 board report and prior board reports
- (14) (13) / (2)
- MSI 2011 board report and prior board reports (15)
- (15) / Prior (15) (16)
- (17)
- (15) / (2)
 MSI 2011 board report and prior board reports (18) (19)
 - (18) / (2)

| - | Pennsylvania Mine Subsidence Insurance Fund 2011 Actuarial Review | | | | | | | | | | | |
|---|--|-------------------------------------|--------------------------------------|--|--|--|--|--|--|--|--|--|
| Indicated Premium Change | | | | | | | | | | | | |
| Item | Percent of \$1000 Coverage In Force | Adjustment to Earned Premium | Restated to Net Earned Premium | | | | | | | | | |
| (1) | (2) | (3) | (4) | | | | | | | | | |
| Written Premium Premium Refund Net Premium Paid Claim Claim Reserve* Claim Fluctuation Reserve** | 60.00% 0.45% 59.55% 12.38% 12.38% | 57.69% 12.00% 1.85% 13.85% | 100.00% 20.80% 3.21% 24.01% | | | | | | | | | |
| Commission Administrative Expense Investment Income^ | 1.00% 22.50% 77.00% | 0.97% 21.80% 74.60% | 1.68% 37.79% 129.31% | | | | | | | | | |
| Underwriting and Investment Profit Indicated Rate Change [^] | 88.28% | | 141.84% -62.31% | | | | | | | | | |
| Proposed Rate Change | | | -17.33% | | | | | | | | | |

| Notes: | |
|--------|--|
| (2) | Exhibit 3 |
| (3) | Reflects Earning Lag of 50% and Annual Written Premium Increase equal to Coverage In Force Increase (Exhibit 3) |
| (4) | (3) / (3) Net Premium |
| * | Based on 12-Ultimate Development Factor in Exhibit 1 |
| ** | Set equal to Average Paid Claim and Claim Reserve. See Exhibit 3 for variability range. |
| ^ | Based on relationships developed from Exhibit 2. |
| ~~ | (Loss + Admin) / (Premium - Commission + Inv Inc) - 1.000 |

| | Pennsylvania Mine Subsidence Insurance Fund 2011 Actuarial Review Rating Program Proposal | | | | | | | | | | | | |
|-------------------------------|---|------------|-------------|------------|-------------|------------|--------|--|--|--|--|--|--|
| | Pres | ent | Propo | sed | | Change | | | | | | | |
| Rating Element | Residential | Non - Res. | Residential | Non - Res. | Residential | Non - Res. | Total | | | | | | |
| | | | | | | | | | | | | | |
| Rate/\$1, First \$5,000 | 0.00200 | 0.00400 | 0.00200 | 0.00200 | 0.0% | -50.0% | -2.0% | | | | | | |
| Rate/\$1, Each Subsequent \$1 | 0.00060 | 0.00120 | 0.00050 | 0.00050 | -16.7% | -58.3% | -19.0% | | | | | | |
| Senior Discount | 10.00% | 0.00% | 10.00% | 0.00% | 0.0% | 0.0% | 0.0% | | | | | | |
| Multiple Policy Discount | 0.00% | 0.00% | 0.00% | 0.00% | 0.0% | 0.0% | 0.0% | | | | | | |
| Condo Assoc Discount | 0.00% | 0.00% | 0.00% | 0.00% | 0.0% | 0.0% | 0.0% | | | | | | |
| Total | | | | | -15.0% | -57.7% | -17.3% | | | | | | |

Note: Non-Resident Rate/\$1 is set as a factor to the Resident Rate

| | Pennsyl | vania Mine S 2011 Ac | ubsidence In tuarial Revie | | nd | |
|----------------------|---------|-------------------------|-------------------------------|------------|-----------|-----------|
| | | Claim | s by Range | | | |
| Top End of Claims | Claim | Settlement Amount | 5,000 | Eliminated | , | 100.000 |
| Range | Count | 25,000 | 100,000 | | | |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) |
| 5,000 | 91 | 223,082 | 0 | 0 | 0 | 0 |
| 10,000 | 67 | 473,187 | 138,187 | 0 | 0 | 0 |
| 15,000 | 36 | 448,805 | 268,805 | 88,805 | 0 | 0 |
| 20,000 | 27 | 462,730 | 327,730 | 192,730 | 0 | 0 |
| 25,000 | 27 | 596,202 | 461,202 | 326,202 | 0 | 0 |
| 50,000 | 43 | 1,493,898 | 1,278,898 | 1,063,898 | 418,898 | 0 |
| 75,000 | 20 | 1,284,496 | 1,184,496 | 1,084,496 | 784,496 | 0 |
| 100,000 | 18 | 1,562,278 | 1,472,278 | 1,382,278 | 1,112,278 | 0 |
| 125,000 | 2 | 211,100 | 201,100 | 191,100 | 161,100 | 11,100 |
| 150,000 | 3 | 426,954 | 411,954 | 396,954 | 351,954 | 126,954 |
| 200,000 | 1 | 176,700 | 171,700 | 166,700 | 151,700 | 76,700 |
| 225,000 | 1 | 218,868 | 213,868 | 208,868 | 193,868 | 118,868 |
| 250,000 | 2 | 500,000 | 490,000 | 480,000 | 450,000 | 300,000 |
| 375,000 | 1 | 352,916 | 347,916 | 342,916 | 327,916 | 252,916 |
| Grand Total | 339 | 8,431,216 | 6,968,134 | 5,924,947 | 3,952,210 | 886,538 |
| Eliminated Loss | | | 1,463,082 | 2,506,269 | 4,479,006 | 7,544,678 |
| Eliminated Ratio* | | | 17.4% | 29.7% | 53.1% | 89.5% |

Notes:

Closed Claims, Provided by MSI, excludes claims without payment Closed Claims, Provided by MSI, excludes claims without payment

(3) - (2) x Eliminated Layer

(3) - (2) x Eliminated Layer
(3) - (2) x Eliminated Layer

(2)
(3)
(4)
(5)
(6)

(7) (3) - (2) x Eliminated Layer

* Eliminated Loss / (3) Total

| | | Penr | - | | | Pennsylvania Mine Subsidence Insurance Fund 2011 Actuarial Review | | | | | | | | | | | | |
|------------------------|--------|------------------|------------------|-------------------------|------------------|--|------------------|-------------------|--|--|--|--|--|--|--|--|--|--|
| | | | Claims b | y Range of C Summary | overage | | | | | | | | | | | | | |
| Top End of Coverage | Claim | Settlement | Coverage | Settlemen | t Amount | Trended Ultimate | Trended Settle | ement Amount | | | | | | | | | | |
| Range | Count | Amount | Amount | Per Claim | Per Coverage | Claim | Per Claim | Per Coverage | | | | | | | | | | |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | | | | | | | | | | |
| 15,000 20,000 | 5 2 | 35,075 22,720 | 66,300 37,200 | 7,015 11,360 | 52.90% 61.07% | | 12,693 20.554 | 95.72% 110.50% | | | | | | | | | | |
| 25,000 | 5 | 60.693 | 114,100 | 12,139 | 53.19% | | 21,963 | 96.24% | | | | | | | | | | |
| 50,000 | 16 | 211,970 | 658,300 | 13,248 | 32.20% | | 23,970 | 58.26% | | | | | | | | | | |
| 75,000 | 34 | 629,508 | 2,257,320 | 18,515 | 27.89% | | 33,500 | 50.46% | | | | | | | | | | |
| 100,000 | 61 | 1,487,074 | 5,532,200 | 24,378 | 26.88% | | 44,109 | 48.64% | | | | | | | | | | |
| 125,000 | 51 | 971,515 | 5,736,700 | 19,049 | 16.94% | | 34,467 | 30.64% | | | | | | | | | | |
| 150,000 | 52 | 1,194,449 | 7,170,700 | 22,970 | 16.66% | | 41,561 | 30.14% | | | | | | | | | | |
| 175,000 | 37 | 1,054,091 | 5,936,400 | 28,489 | 17.76% | | 51,546 | 32.13% | | | | | | | | | | |
| 200,000 | 36 | 916,402 | 6,621,040 | 25,456 | 13.84% | | 46,058 | 25.04% | | | | | | | | | | |
| 225,000 | 15 | 311,723 | 3,134,500 | 20,782 | 9.94% | | 37,601 | 17.99% | | | | | | | | | | |
| 250,000 | 21 | 1,165,094 | 5,165,100 | 55,481 | 22.56% | | 100,384 | 40.81% | | | | | | | | | | |
| 275,000 | 1 | 6,298 | 261,300 | 6,298 | 2.41% | | 11,395 | 4.36% | | | | | | | | | | |
| 350,000 | 1 | 3,770 | 350,000 | 3,770 | 1.08% | | 6,821 | 1.95% | | | | | | | | | | |
| 400,000 | 1 | 352,916 | 376,200 | 352,916 | 93.81% | | 638,548 | 169.74% | | | | | | | | | | |
| 500,000 | 1 | 7,918 | 500,000 | 7,918 | 1.58% | | 14,326 | 2.87% | | | | | | | | | | |
| Total | 339 | 8,431,216 | 43,917,360 | 24,871 | 19.20% | 45,000 | 45,000 | 34.74% | | | | | | | | | | |

Notes:

| (2) | Closed Claims, Provided by MSI, excludes claims without payment |
|-----|---|
| (3) | Closed Claims, Provided by MSI, excludes claims without payment |
| (4) | Closed Claims, Provided by MSI, excludes claims without payment |
| (5) | (3) / (2) |

- (6) (7)
- (8) (9)
- (3) / (4) Exhibit 8 Col (11) (5) x Total (7) / Total (5) (6) x Total (7) / Total (5)

Pennsylvania Mine Subsidence Insurance Fund 2011 Actuarial Review

Claims by Range of Coverage Detail

| Coverage | Data | | | | | | | Clain | n Band (Uppe | r Limit) | | | | | | | Settlement | Settlement |
|----------|------------------|------------|-----------|-----------|-------------|--------------|--------------|-----------|--------------------|----------|---------|---------|---------|---------|---------|------------|------------|------------|
| Band | Element | 5,000 | 10,000 | 15,000 | 20,000 | 25,000 | 50,000 | 75,000 | 100,000 | 125,000 | 150,000 | 200,000 | 225,000 | 250,000 | 375,000 | Total | per Claim | per Cover. |
| 15,000 | Claim Count | 2 | 1 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5 | | • |
| | Total Settlement | 5,925 | 7,550 | 21,600 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 35,075 | 7,015 | 52.9% |
| | Total Coverage | 29,800 | 14,900 | 21,600 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 66,300 | | |
| 20,000 | Claim Count | 0 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | | |
| -, | Total Settlement | 0 | 5,420 | 0 | 17,300 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 22,720 | 11,360 | 61.1% |
| | Total Coverage | 0 | 19,600 | 0 | 17,600 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 37,200 | , | |
| 25,000 | Claim Count | 2 | 0 | 0 | 2 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5 | | |
| -, | Total Settlement | 6.358 | 0 | 0 | 33,935 | 20,400 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 60.693 | 12.139 | 53.2% |
| | Total Coverage | 49.300 | 0 | 0 | 43,500 | 21,300 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 114,100 | , | |
| 50.000 | Claim Count | 6 | 4 | 0 | 2 | 0 | 4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 16 | | |
| , | Total Settlement | 16.089 | 33.688 | 0 | 32.705 | 0 | 129.488 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 211.970 | 13,248 | 32.2% |
| | Total Coverage | 251,700 | 168,000 | 0 | 88,700 | 0 | 149,900 | 0 | Ő | 0 | 0 | | 0 | 0 | 0 | 658,300 | 10,210 | 02.270 |
| 75.000 | Claim Count | 12 | 5 | 3 | 2 | 2 | 6 | 4 | 0 | 0 | 0 | Ţ | 0 | 0 | 0 | 34 | | |
| 10,000 | Total Settlement | 24,040 | 40,701 | 36,411 | 31,346 | 42,062 | 205,627 | 249,320 | Ő | 0 | 0 | - | 0 | 0 | 0 | 629,508 | 18,515 | 27.9% |
| | Total Coverage | 800.100 | 354,300 | 196,400 | 138,700 | 138,900 | 362,400 | 266,520 | Ő | 0 | 0 | 0 | 0 | 0 | 0 | 2,257,320 | 10,010 | 21.070 |
| 100.000 | Claim Count | 18 | 9 | 8 | 6 | 3 | 6 | 200,020 | 8 | 0 | 0 | 0 | 0 | 0 | 0 | 2,207,020 | | |
| 100,000 | Total Settlement | 49,708 | 62,540 | 102,267 | 103,503 | 67,733 | 209,249 | 201,150 | 690,924 | 0 | 0 | | 0 | 0 | 0 | 1,487,074 | 24,378 | 26.9% |
| | Total Coverage | 1,617,100 | 785,200 | 757,200 | 539,600 | 274,600 | 567,400 | 267,000 | 724,100 | 0 | 0 | - | 0 | 0 | 0 | 5,532,200 | 24,570 | 20.370 |
| 125,000 | Claim Count | 1,017,100 | 11 | 737,200 | 539,000 | 2/4,000 | 5 | 207,000 | 24,100 | 1 | 0 | Ű | 0 | 0 | 0 | 5,552,200 | | |
| 123,000 | Total Settlement | 35.664 | 77,086 | 91,005 | 91.312 | 41,780 | 171.774 | 194,662 | 158,732 | 109,500 | 0 | | 0 | 0 | 0 | 971,515 | 19.049 | 16.9% |
| | Total Coverage | 1,683,100 | 1,291,500 | 781,900 | 563,200 | 232,900 | 529,200 | 312,100 | 229,000 | 113,800 | 0 | - | - | 0 | 0 | 5,736,700 | 15,045 | 10.976 |
| 150.000 | Claim Coverage | 1,003,100 | 1,291,500 | 781,900 | 303,200 | 232,900 | 529,200 | 312,100 | 229,000 | 113,600 | 1 | 0 | 0 | 0 | 0 | 5,756,700 | | |
| 150,000 | Total Settlement | 24,551 | 102,145 | 63,944 | 4 66,427 | 113,371 | 4 134,838 | 188,980 | 271,594 | 101,600 | 127,000 | - | 0 | 0 | 0 | - | 22,970 | 16.7% |
| | | | | | | | 563,300 | | 435,900 | | 127,000 | | 0 | 0 | 0 | 1,194,449 | 22,970 | 10.7% |
| 175,000 | Total Coverage | 1,477,600 | 2,066,700 | 705,400 | 530,400 | 700,200 | 563,300 | 435,000 | 435,900 | 129,200 | 2 | | 0 | 0 | 0 | 7,170,700 | | |
| 175,000 | Claim Count | 14.070 | 50.004 | - | 17 400 | | , | 50 207 | | 0 | | | 0 | 0 | 0 | - | 00,400 | 47.00/ |
| | Total Settlement | 14,373 | 56,324 | 71,057 | 17,408 | 91,132 | 268,185 | 59,307 | 176,352 306,200 | | 299,954 | 0 | 0 | 0 | 0 | 1,054,091 | 28,489 | 17.8% |
| 200.000 | Total Coverage | 1,131,400 | 1,104,300 | 974,000 | 163,200 | 643,500 8 | 1,137,000 | 162,300 | 306,200 | 0 | 314,500 | | - | 0 | 0 | 5,936,400 | | |
| 200,000 | Claim Count | | 11 701 | 2 | ÷ | - | | - | 1 | 0 | 0 | | 0 | - | 0 | 36 | 05 450 | 40.00/ |
| | Total Settlement | 18,151 | 44,701 | 25,647 | 53,094 | 175,724 | 145,468 | 192,018 | 84,900 | 0 | 0 | | 0 | 0 | 0 | 916,402 | 25,456 | 13.8% |
| 005 000 | Total Coverage | 1,290,300 | 1,327,440 | 372,600 | 538,400 | 1,439,600 | 741,800 | 556,000 | 178,200 | 0 | 0 | | 0 | 0 | 0 | 6,621,040 | | |
| 225,000 | Claim Count | 3 | | 1 | 1 | 1 | - | 1 | 1 | - | 0 | | - | 0 | 0 | 15 | 00 700 | 0.00/ |
| | Total Settlement | 7,768 | 23,717 | 12,950 | 15,700 | 23,300 | 84,558 | 57,480 | 86,250 | 0 | 0 | | 0 | 0 | 0 | 311,723 | 20,782 | 9.9% |
| | Total Coverage | 628,300 | 830,300 | 203,800 | 209,500 | 213,000 | 633,300 | 213,000 | 203,300 | 0 | 0 | | 0 | 0 | 0 | 3,134,500 | | |
| 250,000 | Claim Count | 7 | 1 | 2 | 0 | 1 | 4 | 2 | 1 | 0 | 0 | | 1 | 2 | 0 | 21 | | |
| | Total Settlement | 16,686 | 5,100 | 23,925 | 0 | 20,700 | 144,710 | 141,579 | 93,527 | 0 | 0 | | 218,868 | 500,000 | 0 | 1,165,094 | 55,481 | 22.6% |
| | Total Coverage | 1,710,000 | 250,000 | 480,000 | 0 | 250,000 | 1,000,000 | 500,000 | 225,100 | 0 | 0 | Ţ | | 500,000 | 0 | 5,165,100 | | |
| 275,000 | Claim Count | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | • | 0 | 0 | 0 | 1 | | |
| | Total Settlement | 0 | 6,298 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 6,298 | 6,298 | 2.4% |
| | Total Coverage | 0 | 261,300 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 261,300 | | |
| 350,000 | Claim Count | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 0 | 1 | | |
| | Total Settlement | 3,770 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 3,770 | 3,770 | 1.1% |
| | Total Coverage | 350,000 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 350,000 | | |
| 400,000 | Claim Count | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 1 | 1 | | |
| | Total Settlement | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 352,916 | 352,916 | 352,916 | 93.8% |
| | Total Coverage | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 376,200 | 376,200 | | |
| 500,000 | Claim Count | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 1 | | |
| | Total Settlement | 0 | 7,918 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 7,918 | 7,918 | 1.6% |
| | Total Coverage | 0 | 500,000 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 500,000 | | |
| Total | Claim Count | 91 | 67 | 36 | 27 | 27 | 43 | 20 | 18 | 2 | 3 | 1 | 1 | 2 | 1 | 339 | | |
| | Total Settlement | 223,082 | 473,187 | 448,805 | 462,730 | 596,202 | 1,493,898 | 1,284,496 | 1,562,278 | 211,100 | 426,954 | 176,700 | 218,868 | 500,000 | 352,916 | 8,431,216 | 24,871 | 19.2% |
| | Total Coverage | 11,018,700 | 8,973,540 | 4,492,900 | 2,832,800 | 3,914,000 | 5,684,300 | 2,711,920 | 2,301,800 | 243,000 | 441,500 | 176,700 | 250,000 | 500,000 | 376,200 | 43,917,360 | | |

| | | | | | Penn | • | ine Subsid | lence Insur I Review | ance Fun | d | | | | | |
|------------------|--|------------|---------|-------|-------|-----------|------------|-------------------------|----------|------------|------------|----------|--------|-----------|----------|
| | Estimated Average Paid Claim as of 12/31/2011 | | | | | | | | | | | | | | |
| Fiscal | | | | | | | | | | | | | | Inflation | Trended |
| Report Year | Claim | Claim | Average | Cou | nt | , Amou | unt | Claim C | Count | Claim A | mount | Claim Av | erage | Index | Ultimate |
| Beginning 7/1 | Count | Amount | Claim | Low | High | Low | High | Low | High | Low | High | Low | High | 3.35% | Average |
| (1) | (2) | (3) | (4) | (5a) | (5b) | (6a) | (6b) | (7a) | (7b) | (8a) | (8b) | (9a) | (9b) | (10) | (11) |
| 1991 | 43 | 1,415,693 | 32,923 | 1.005 | 1.007 | 1.014 | 1.024 | 43.22 | 43.30 | 1,435,578 | 1,449,792 | 33,219 | 33,481 | 1.964 | 65,514 |
| 1992 | 34 | 1,012,866 | 29,790 | 1.005 | 1.007 | 1.014 | 1.024 | 34.17 | 34.24 | 1,027,207 | 1,037,377 | 30,058 | 30,295 | 1.901 | 57,359 |
| 1993 | 42 | 1,279,515 | 30,465 | 1.005 | 1.007 | 1.014 | 1.024 | 42.22 | 42.30 | 1,297,776 | 1,310,625 | 30,739 | 30,981 | 1.839 | 56,757 |
| 1994 | 24 | 744,356 | 31,015 | 1.005 | 1.007 | 1.014 | 1.024 | 24.13 | 24.18 | 755,063 | 762,538 | 31,294 | 31,540 | 1.780 | 55,910 |
| 1995 | 40 | 973,174 | 24,329 | 1.005 | 1.007 | 1.014 | 1.025 | 40.22 | 40.30 | 987,282 | 997,057 | 24,548 | 24,742 | 1.722 | 42,437 |
| 1996 | 21 | 602,438 | 28,688 | 1.006 | 1.008 | 1.015 | 1.025 | 21.12 | 21.16 | 611,240 | 617,291 | 28,945 | 29,174 | 1.666 | 48,418 |
| 1997 | 14 | 406,461 | 29,033 | 1.006 | 1.008 | 1.015 | 1.025 | 14.08 | 14.11 | 412,445 | 416,529 | 29,294 | 29,525 | 1.612 | 47,413 |
| 1998 | 22 | 513,075 | 23,322 | 1.006 | 1.008 | 1.015 | 1.025 | 22.13 | 22.17 | 520,686 | 525,842 | 23,531 | 23,717 | 1.560 | 36,852 |
| 1999 | 13 | 503,114 | 38,701 | 1.006 | 1.008 | 1.015 | 1.025 | 13.08 | 13.10 | 510,634 | 515,690 | 39,049 | 39,357 | 1.509 | 59,173 |
| 2000 | 13 | 332,401 | 25,569 | 1.007 | 1.009 | 1.016 | 1.026 | 13.08 | 13.11 | 337,575 | 340,918 | 25,799 | 26,003 | 1.460 | 37,828 |
| 2001 | 15 | 497,757 | 33,184 | 1.008 | 1.010 | 1.017 | 1.027 | 15.11 | 15.14 | 506,011 | 511,021 | 33,482 | 33,746 | 1.413 | 47,503 |
| 2002 | 21 | 1,341,643 | 63,888 | 1.009 | 1.011 | 1.018 | 1.028 | 21.18 | 21.22 | 1,365,256 | 1,378,773 | 64,462 | 64,971 | 1.367 | 88,492 |
| 2003 | 9 | 160,478 | 17,831 | 1.010 | 1.012 | 1.019 | 1.029 | 9.09 | 9.10 | 163,466 | 165,084 | 17,991 | 18,133 | 1.323 | 23,898 |
| 2004 | 8 | 246,683 | 30,835 | 1.011 | 1.013 | 1.020 | 1.030 | 8.09 | 8.10 | 251,527 | 254,018 | 31,097 | 31,342 | 1.280 | 39,968 |
| 2005 | 25 | 1,169,872 | 46,795 | 1.015 | 1.017 | 1.021 | 1.031 | 25.36 | 25.42 | 1,194,036 | 1,205,858 | 47,074 | 47,446 | 1.239 | 58,543 |
| 2006 | 8 | 502,142 | 62,768 | 1.020 | 1.022 | 1.024 | 1.034 | 8.16 | 8.17 | 514,052 | 519,142 | 63,017 | 63,514 | 1.199 | 75,830 |
| 2007 | 18 | 506,439 | 28,136 | 1.027 | 1.032 | 1.037 | 1.049 | 18.49 | 18.57 | 524,941 | 531,451 | 28,388 | 28,611 | 1.160 | 33,053 |
| 2008 | 52 | 1,107,071 | 21,290 | 1.040 | 1.053 | 1.057 | 1.081 | 54.09 | 54.74 | 1,170,467 | 1,196,671 | 21,640 | 21,863 | 1.122 | 24,409 |
| 2009 | 16 | 462,082 | 28,880 | 1.074 | 1.119 | 1.081 | 1.127 | 17.19 | 17.90 | 499,547 | 520,773 | 29,067 | 29,090 | 1.086 | 31,574 |
| 2010 | 31 | 837,510 | 27,016 | 1.142 | 1.260 | 1.111 | 1.198 | 35.39 | 39.06 | 930,341 | 1,003,165 | 26,289 | 25,681 | 1.051 | 27,301 |
| Total | 469 | 14,614,770 | | | | | | 480 | 485 | 15,015,132 | 15,259,616 | | | | |
| Average | | | | | | | | | | | | | | | 47,912 |
| Weighted Average | ge - Low | | | | | | | | | | | | | | 47,320 |
| Weighted Average | ge - High | | | | | | | | | | | | | | 47,122 |
| Prior 2007 Selec | ted Average | | | | | | | | | | | | | | 45,000 |
| Selected | 5- | | | | | | | | | | | | | | 45,000 |
| | | | | | | | | | | | | | | | |

Notes: (2)

| (2) | Provided by MSI. 1991 - 1996 from prior analysis | (7) |
|-----|---|------|
| (3) | Exhibit 1 Col (2) | (8) |
| (4) | (3) / (2) | (9) |
| (5) | Exhibit 10 - cumulative claim count factors | (10) |
| (6) | Exhibit 10 - cumulative settlement amount factors | (11) |
| | | |

(2) x (5) (3) x (6) (8) / (7) Based on claim trend of 3.35% [average of (9)] x (10)

| Fiscal Report Year | R | eported Claims | | SI | upported Claims | 3 | | Paid Claims | | Ratio of F | Paid to Reported | Claims |
|-----------------------|------------|----------------|-------|------------|-----------------|------|------|----------------|---------------|-----------------|------------------|--------|
| Beginning 7/1 | Anthracite | Bituminous | Total | Anthracite | Bituminous | | | Bituminous | Total | Anthracite | Bituminous | Total |
| (1) | (2a) | (2b) | (2c) | (3a) | (3b) | (3c) | (4a) | (4b) | (4c) | (5a) | (5b) | (5c) |
| 2000 | 29 | 131 | 160 | 4 | 9 | 13 | 4 | 9 | 13 | 0.138 | 0.069 | 0.08 |
| 2001 | 30 | 186 | 216 | 0 | 15 | 15 | 0 | 14 | 14 | 0.000 | 0.075 | 0.06 |
| 2002 | 28 | 223 | 251 | 2 | 20 | 22 | 2 | 20 | 22 | 0.071 | 0.090 | 0.08 |
| 2003 | 21 | 137 | 158 | 3 | 8 | 11 | 2 | 7 | 9 | 0.095 | 0.051 | 0.05 |
| 2004 | 25 | 124 | 149 | 2 | 8 | 10 | 1 | 8 | 9 | 0.040 | 0.065 | 0.06 |
| 2005 | 27 | 206 | 233 | 8 | 23 | 31 | 8 | 22 | 30 | 0.296 | 0.107 | 0.12 |
| 2006 | 29 | 155 | 184 | 2 | 11 | 13 | 2 | 11 | 13 | 0.069 | 0.071 | 0.07 |
| 2007 | 27 | 168 | 195 | 8 | 7 | 15 | 8 | 7 | 15 | 0.296 | 0.042 | 0.07 |
| 2008 | 28 | 199 | 227 | 7 | 20 | 27 | 7 | 20 | 27 | 0.250 | 0.101 | 0.11 |
| 2009 | 25 | 150 | 175 | 3 | 8 | 11 | 3 | 7 | 10 | 0.120 | 0.047 | 0.05 |
| 2010 | 26 | 218 | 244 | 10 | 10 | 20 | 6 | 8 | 14 | 0.231 | 0.037 | 0.05 |
| Total | 295 | 1,897 | 2,192 | 49 | 139 | 188 | 43 | 133 | 176 | 0.146 | 0.070 | 0.08 |
| Average | | · | | | | | | | | 0.146 | 0.068 | 0.07 |
| | | | | | | | | Average Paid (| Claim (from I | Exhibit 8) | | 45,00 |
| | | | | | | | | Selected Ratio | of Paid to R | eported Claims | ; | 0.08 |
| | | | | | | | | Selected Facto | or Reserve p | er Reported Cla | aim | 3,60 |

Pennsylvania Mine Subsidence Insurance Fund 2011 Actuarial Review

Notes:

(2) MSI 2011 board report

(3) MSI 2011 board report

(4) (5) MSI 2011 board report

(4) / (2)

Pennsylvania Mine Subsidence Insurance Fund 2011 Actuarial Review Report Lag Analysis

| Claim Count | | | | | | | | | | | | | | | | | |
|-------------|-------|-----|----|---|----|---|---|---|------------|---|----|----|----|----|----|----|-------|
| Report | | | | | | | | F | leport Lag | | | | | | | | |
| Fiscal Year | 0 | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 19 | 26 | 31 | 40 | Total |
| 1997 | 130 | 12 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 145 |
| 1998 | 146 | 9 | 6 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 163 |
| 1999 | 190 | 20 | 3 | 0 | 1 | 1 | 1 | 0 | 1 | 0 | 0 | 1 | 1 | 0 | 0 | 0 | 219 |
| 2000 | 154 | 10 | 9 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 174 |
| 2001 | 202 | 20 | 5 | 2 | 2 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 232 |
| 2002 | 233 | 28 | 3 | 5 | 2 | 1 | 1 | 1 | 0 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 276 |
| 2003 | 134 | 9 | 2 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 148 |
| 2004 | 142 | 8 | 2 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 154 |
| 2005 | 233 | 15 | 3 | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 253 |
| 2006 | 168 | 9 | 1 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 180 |
| 2007 | 21 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 21 |
| 2008 | 55 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 56 |
| 2009 | 16 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 18 |
| 2010 | 36 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 36 |
| Total | 1,860 | 142 | 36 | 9 | 10 | 4 | 2 | 1 | 3 | 1 | 1 | 5 | 1 | 0 | 0 | 0 | 2,075 |

| Report | | | | | | | | R | eport Lag | | | | | | | | |
|---|--|---|--|--|---|---|---|---|---|---|---|---|---|---|--|--|------------------|
| Fiscal Year | 0 | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 19 | 26 | 31 | 40 | Total |
| 1997 | 406,461 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 406, |
| 1998 | 437,850 | - | 75,225 | - | - | - | - | - | - | - | - | - | - | - | - | - | 513, |
| 1999 | 440,394 | - | - | - | - | - | - | - | 2,720 | - | - | - | 60,000 | - | - | - | 503, |
| 2000 | 310,868 | 5,420 | 16,113 | - | - | - | - | - | - | - | - | - | - | - | - | - | 332. |
| 2001 | 424,015 | 5,147 | - | 68.595 | - | - | - | - | - | - | - | - | - | - | - | - | 497 |
| 2002 | 1,371,296 | 26,172 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 1,397 |
| 2003 | 150,653 | | - | - | | | | | - | - | - | 9.825 | - | - | - | - | 160 |
| 2004 | 246,683 | - | - | - | | | | | - | - | - | - | - | - | - | - | 246 |
| 2005 | 1,147,372 | - | 22,500 | _ | - | | | | | | _ | | _ | | _ | | 1,169 |
| 2005 | 502,142 | - | 22,500 | - | - | - | - | - | - | - | - | - | - | - | - | | 502 |
| 2000 | 506,439 | | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 506 |
| | | | - | - | - | - | - | - | - | - | - | 40.005 | - | - | - | | |
| 2008 2009 | 1,066,846 407,304 | - 54,778 | - | - | - | - | - | - | - | - | - | 40,225 | - | - | - | - | 1,107 462 |
| | | 54,776 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | |
| 2010 Total | 837,510 8,255,833 | - 91,517 | - 113,838 | - 68,595 | - | - | - | - | - 2,720 | - | - | - 50,050 | - 60,000 | - | - | - | 837 8,642 |
| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| rcentage Increm | ental Increase | | | | | | | | | | | | | | | | |
| | | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 19 | 26 | 31 | 40 | Tail |
| laim Count | | 7.63% | 1.80% | 0.44% | 0.49% | 0.19% | 0.10% | 0.05% | 0.15% | 0.05% | 0.05% | 0.24% | 0.05% | 0.00% | 0.00% | 0.00% | 0. |
| ettlement Amt | | 1.11% | 1.36% | 0.81% | 0.00% | 0.00% | 0.00% | 0.00% | 0.03% | 0.00% | 0.00% | 0.59% | 0.70% | 0.00% | 0.00% | 0.00% | 0. |
| | | | | | | | | | | | | | | | | | |
| rior 2007 Analysis | Selected Factor | | | | | | | | | | | | | | | | |
| | Selected Factor | rs | | | 1 005 | 1 005 | 1 002 | 1 001 | 1 000 | 1 000 | 1 025 | 1 002 | 1 001 | 1.001 | 1.001 | 1 001 | |
| laim Count | Selected Factor | rs 1.050 | 1.020 | 1.015 | 1.005 | 1.005 | 1.002 | 1.001 | 1.000 | 1.000 | 1.025 | 1.002 | 1.001 | 1.001 | 1.001 | 1.001 | |
| laim Count | Selected Factor | rs | | | 1.005 1.005 | 1.005 1.001 | 1.002 1.001 | 1.001 1.001 | 1.000 1.000 | 1.000 1.000 | 1.025 1.001 | 1.002 1.000 | 1.001 1.010 | 1.001 1.000 | 1.001 1.000 | 1.001 1.000 | |
| Prior 2007 Analysis Claim Count Settlement Amt Selected Factors - | | rs 1.050 | 1.020 | 1.015 | | | | | | | | | | | | | |
| laim Count ettlement Amt elected Factors - | | rs 1.050 1.025 1.050 | 1.020 1.020 1.015 | 1.015 1.020 1.010 | | | | | | | | | | | | | 1 |
| laim Count ettlement Amt elected Factors - laim Count | LOW | rs 1.050 1.025 | 1.020 1.020 | 1.015 1.020 | 1.005 | 1.001 | 1.001 | 1.001 | 1.000 | 1.000 | 1.001 | 1.000 | 1.010 | 1.000 | 1.000 | 1.000 | 1 |
| Claim Count Settlement Amt | LOW 1.075 1.030 | rs 1.050 1.025 1.050 | 1.020 1.020 1.015 | 1.015 1.020 1.010 | 1.005 1.005 | 1.001 1.005 | 1.001 | 1.001 | 1.000 | 1.000 | 1.001 1.001 | 1.000 | 1.010 1.001 | 1.000 | 1.000 | 1.000 | 1 1 1 1 |
| laim Count ettlement Amt elected Factors - laim Count ettlement Amt elected Factors - | LOW 1.075 1.030 HIGH | 1.050 1.025 1.050 1.025 | 1.020 1.020 1.015 1.020 | 1.015 1.020 1.010 1.020 | 1.005 1.005 1.005 | 1.001 1.005 1.001 | 1.001 1.002 1.001 | 1.001 1.001 1.001 | 1.000 1.001 1.001 | 1.000 1.001 1.001 | 1.001 1.001 1.001 | 1.000 1.001 1.001 | 1.010 1.001 1.001 | 1.000 1.001 1.001 | 1.000 1.001 1.001 | 1.000 1.001 1.001 | 1 1 1 |
| laim Count ettlement Amt elected Factors - laim Count ettlement Amt elected Factors - laim Count | LOW 1.075 1.030 | rs 1.050 1.025 1.050 | 1.020 1.020 1.015 | 1.015 1.020 1.010 | 1.005 1.005 | 1.001 1.005 | 1.001 | 1.001 | 1.000 | 1.000 | 1.001 1.001 | 1.000 | 1.010 1.001 | 1.000 | 1.000 | 1.000 | · · · |
| laim Count ettlement Amt elected Factors - laim Count ettlement Amt | LOW 1.075 1.030 HIGH 1.150 1.075 | rs 1.050 1.025 1.050 1.025 1.100 | 1.020 1.020 1.015 1.020 | 1.015 1.020 1.010 1.020 1.015 | 1.005 1.005 1.005 | 1.001 1.005 1.001 1.005 | 1.001 1.002 1.001 1.002 | 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1.010 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1 |
| laim Count ettlement Amt elected Factors - laim Count ettlement Amt elected Factors - laim Count ettlement Amt umulative Factors | LOW 1.075 1.030 HIGH 1.150 1.075 s - LOW | 1.050 1.025 1.050 1.025 1.025 1.100 1.050 | 1.020 1.020 1.015 1.020 1.025 1.035 | 1.015 1.020 1.010 1.020 1.015 1.025 | 1.005 1.005 1.005 1.005 1.005 | 1.001 1.005 1.001 1.005 1.001 | 1.001 1.002 1.001 1.002 1.001 | 1.001 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1.001 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 | 1.010 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 | |
| laim Count ettlement Amt elected Factors - laim Count ettlement Amt elected Factors - laim Count ettlement Amt | LOW 1.075 1.030 HIGH 1.150 1.075 | rs 1.050 1.025 1.050 1.025 1.100 | 1.020 1.020 1.015 1.020 | 1.015 1.020 1.010 1.020 1.015 | 1.005 1.005 1.005 | 1.001 1.005 1.001 1.005 | 1.001 1.002 1.001 1.002 | 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1.010 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 | 1 |
| laim Count ettlement Amt elected Factors - laim Count ettlement Amt elected Factors - laim Count ettlement Amt umulative Factors laim Count ettlement Amt | LOW 1.075 1.030 HIGH 1.150 1.075 3 - LOW 1.183 1.127 | rs 1.050 1.025 1.050 1.025 1.100 1.050 1.100 | 1.020 1.020 1.015 1.020 1.025 1.035 | 1.015 1.020 1.010 1.020 1.015 1.025 | 1.005 1.005 1.005 1.005 1.005 | 1.001 1.005 1.001 1.005 1.001 | 1.001 1.002 1.001 1.002 1.001 | 1.001 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 | 1.001 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 | 1.010 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 1.003 | 1.001 1.001 1.001 1.001 1.001 1.002 | · · · |
| laim Count ettlement Amt elected Factors - laim Count ettlement Amt elected Factors - laim Count ettlement Amt umulative Factors laim Count | LOW 1.075 1.030 HIGH 1.150 1.075 3 - LOW 1.183 1.127 | rs 1.050 1.025 1.050 1.025 1.100 1.050 1.100 | 1.020 1.020 1.015 1.020 1.025 1.035 | 1.015 1.020 1.010 1.020 1.015 1.025 | 1.005 1.005 1.005 1.005 1.005 | 1.001 1.005 1.001 1.005 1.001 | 1.001 1.002 1.001 1.002 1.001 | 1.001 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 | 1.001 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 | 1.010 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 | 1.000 1.001 1.001 1.001 1.001 1.003 | 1.001 1.001 1.001 1.001 1.001 1.002 | |

Pennsylvania Mine Subsidence Insurance Fund **2011 Actuarial Review Net Premium to Surplus Ratios** Net Premium Implied MSIF Surplus to Surplus Based on Premium of \$6,000,000 Characteristic Ratio (1) (2) (3) 3,000,000 Historic Benchmark (All Writers) 2/1 Current Industry Trend (All Writers) 6,700,000 0.90/1 Industry Property Writers (2006-2010) 0.85 / 1 7,100,000 Industry Property Writers (2010) 8,000,000 0.75 / 1 Select Property (only) Reinsurers (2006-2010) 0.51 / 1 11,800,000 Select Property (only) Reinsurers (2010) 12,000,000 0.50 / 1 California Earthquake Authority (2006-2010) 54,500,000 0.11/1 California Earthquake Authority (2011) 40,000,000 0.15/1

| | Implied MSIF Surplus Based on Premium of | Surplus per \$1,000 |
|---|---|------------------------|
| Ob and a table tis | | . , |
| Characteristic | \$6,000,000 | CIF |
| (4) | (5) | (6) |
| Select Property (only) Reinsurers (2010) | 12,000,000 | \$1.33 |
| California Earthquake Authority (2011) | 40,000,000 | 4.44 |
| California Earthquake Authority (CIF basis) | 116,600,000 | 12.95 |
| Pennsylvania MSIF (Current actual) | 86,740,060 | 9.64 |
| Pennsylvania MSIF (Current formula) | | 7.43 |
| Recommended MSIF Low | | 4.44 |
| Recommended MSIF High | | 12.95 |

| Notes: | |
|--------|-----------------------------|
| (1) | A.M. Best company data |
| (2) | A.M. Best company data |
| (3) | \$6M / Col (2) |
| (4) | \$(M / Col (2) |
| (5) | Col (3) and CEA data |
| (6) | Col (5) / Exhibit 3 Col (2) |