STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION

In the Matter of: TRAVELERS PERSONAL INSURANCE COMPANY, a Connecticut Corporation, Respondent.	Case No. INS-26-0008 FINAL ORDER TO CEASE AND DESIST, ORDER ASSESSING CIVIL PENALTIES, AND CONSENT TO ENTRY OF ORDER THIS IS A FINAL ORDER

The Director of the Department of Consumer and Business Services for the State of Oregon ("Director"), acting by and through the Oregon Division of Financial Regulation ("Division), and in accordance with Oregon Revised Statutes ("ORS") chapters 731, 732, 733, 734, 735, 737, 742, 743, 743A, 743B, 744, 746, 748 and 750 ("Insurance Code") and ORS 183.430(2), has concluded that Travelers Personal Insurance Company ("Travelers") engaged in conduct that violated the Insurance Code.

Travelers wishes to resolve and settle this matter with the Director.

Now, therefore, as evidenced by the authorized signatures subscribed on this Order, Travelers hereby CONSENTS to entry of this Order upon the Director's Findings of Fact and Conclusions of Law as stated hereinafter.

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387

FINDINGS OF FACT

The Director FINDS that:

1. Travelers is a Property and Casualty carrier that provides Property and Casualty insurance in Oregon under a Certificate of Authority issued by the Director. Travelers' NAIC Company Code Number is 38130.

2. Traveler's business address is One Tower Square, Hartford, CT 06183.

3. During the time frame at issue in this Order, Travelers had approximately 159,750 unique Homeowners policies active in Oregon.

Travelers Quantum Home 2.0

4. On November 19, 2017, Travelers introduced its Quantum Home 2.0 homeowner's insurance product.

5. When Travelers introduced Quantum Home 2.0 to the Oregon market, Travelers utilized its original Travelers Insurance Score ("TIS") model to price policies.

6. On May 19, 2019, Travelers introduced its Travelers Insurance Score 2.0 ("TIS 2.0") pricing model to Oregon. At this time, TIS 2.0 replaced TIS as the pricing model for Quantum Home 2.0.

7. In early September of 2023, Travelers became aware that TIS 2.0 was employing rating factors that differed from those disclosed by Travelers in its filings with the Director.

8. Specifically, TIS 2.0 improperly included the following credit history variables:

(a) Disputed Trades;

(b) Lost/Stolen Cards;

(c) Medical Trades;

(d) Authorized User Trades; and

(e) Invalid Open Date.

9. As a result of the improper inclusion of these variables, 1,764 Travelers customers in Oregon were overcharged for coverage relative to the pricing model disclosed to the Director, and 756 were undercharged.

10. Travelers began the process of correcting the improperly included variables in late September of 2023.

11. In March of 2024, Travelers disclosed the inclusion of the improper rating variables in the TIS 2.0 price model to the Director.

12. Travelers completed the process of removing the improper variables in September of 2024.

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387

13. As part of the process of correcting the improper inclusions, Travelers issued system credits or refunds to the 1,764 Oregon customers who were overcharged for their policies. In total, Travelers issued $179,314 in refunds to its customers and issued credits in the amount of $79,309 against future premium payments. [1]

CONCLUSIONS OF LAW

The Director CONCLUDES the following:

Improper Insurance Scoring Model

14. Pursuant to ORS 746.662(1), an insurer may not use credit history to determine "personal insurance eligibility, premiums or rates for coverage" unless the insurer has filed its insurance scoring model with the Director. The insurance scoring model must include "all attributes and factors used in the calculation of an insurance score."

15. Travelers violated ORS 746.662(1) in 2,520 instances by improperly using the credit history variables listed in Paragraph 8 in TIS 2.0 without including those variables in the version of the TIS 2.0 pricing model filed with the Director.

Cease and Desist Authority

16. Under ORS 731.252(1), because the Director has reason to believe that Travelers has violated of ORS 746.662(1), the Director may issue an order to Travelers to cease and desist from violations of ORS 746.662(1).

Civil Penalties Authority

17. Under ORS 731.988(1), the Director may impose a civil penalty in an amount not to exceed $10,000 for each violation of the Insurance Code. Each violation is a separate offense.

/ / /

/ / /

[1] Travelers did not attempt to recoup from the 756 customers who were undercharged as a result of the improper inclusions.

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387

ORDERS

Now therefore, the Director issues the following Orders:

Cease and Desist

18. As authorized by ORS 731.252(1), the Director ORDERS Travelers to CEASE AND DESIST from violating ORS 746.662(1)

Civil Penalties

19. As authorized by ORS 731.988(1), the Director hereby assesses civil penalties against Travelers in the amount of $62,500 for violating ORS 746.662 in 2,520 instances.

20. The Director hereby SUSPENDS $31,250 of the $62,500 civil penalty described in Paragraph 19 above for a period of three years from the effective date of this Order, provided that, for a period of three years following the effective date of this Order, Travelers has complied with the Order terms and committed no new violations of the Insurance Code or of any rules adopted thereunder. The failure of Travelers to fulfill any of the terms of this Order shall render the suspended penalties immediately due and payable.

21. The remaining $31,250 of the CIVIL PENALTY assessed herein is due and owing at the time this Order is returned to the Division.

22. The suspended CIVIL PENALTY shall be waived three years from the effective date of this Order, provided Travelers adheres to the terms of this Order and does not commit any further violations of the Oregon Insurance Code.

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387

FINAL ORDER

23. This Order is a "Final Order" under ORS 183.310(6)(b). Subject to that provision, the entry of this Order does not limit other remedies that are available to the Director under Oregon law.

SO ORDERED this 24th day of September, 2026.

Sean E. O'Day, Director
Department of Consumer and Business Services

/s/ Dorothy Bean

Dorothy Bean, Chief of Enforcement
Division of Financial Regulation

[The remainder of this page intentionally left blank.]

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387

ENTITY CONSENT TO ENTRY OF ORDER

I, Christine Palmieri, state that I am an officer of TRAVELERS PERSONAL INSURANCE COMPANY and authorized to act on its behalf. I have read the foregoing Order and I know and fully understand the contents hereof. I have been advised of TRAVELERS PERSONAL INSURANCE COMPANY'S right to a hearing and right to be represented by counsel in this matter. TRAVELERS PERSONAL INSURANCE COMPANY voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order. TRAVELERS PERSONAL INSURANCE COMPANY understands that the Director reserves the right to take further actions against it to enforce this Order or to take appropriate action upon discovery of other violations of the Insurance Code by TRAVELERS PERSONAL INSURANCE COMPANY. TRAVELERS PERSONAL INSURANCE COMPANY will fully comply with the terms and conditions stated herein.

TRAVELERS PERSONAL INSURANCE COMPANY understands that this Consent Order is a public document.

Signature: /s/ Christine Palmieri

Position Held: Vice President

State of CT

County of Hartford

Signed or attested before me on this 10th day of September, 2026

By Christine Palmieri

/s/ Marissa B Mills

Notary Public

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387