



Sean F. O'Connor  
Regulatory Counsel  
Liberty Mutual Insurance  
175 Berkeley Street  
Boston, MA 02116  
857-224-2388  
Sean.OConnor@LibertyMutual.com

Brian J. Fordham  
Property & Casualty Program Manager, Division of Financial Regulation  
Oregon Department of Consumer & Business Services  
350 Winter St. NE, Room 410  
Salem, OR 97309

April 11, 2023

Re: Targeted Market Conduct Examination Report  
Safeco Insurance Company of Oregon, NAIC Co Code 11071

Dear Mr. Fordham,

Please accept the following in response to your letter dated April 5, 2023.

As indicated during the closing conference, and our follow up response, Safeco Insurance Company of Oregon (Safeco) is in general agreement with the findings in the draft report. However, it should be noted that Safeco provided an informal written response as a courtesy to the Division. During the conference, the Division requested a response to the draft report by the end of the week, instead of 30 calendar days. We also note that Safeco was not provided with a cover letter in advance of the closing conference. Had Safeco been granted 30 calendar days within which to repond, the company would have submitted a more formal written response.

Safeco agrees with the the Market Conduct Exam Report determination that the Company passed all four standards of the exam. However, we take this opportunity to respond to the Standard #8 comment that the notifications to impacted policyholders did not include "information related to the Emergency Order or why these policies were no longer scheduled to be cancelled..." For purposes of clarification, the Wildfire Emergency Order did not expressly require additional information explaining why the cancellation was delayed. As noted in the comment, Safeco did issue notice to the impacted policyholders advising that the policies would not be cancelled, as required by the Emergency Order. Although an explanation regarding the reason for delayed cancellation was not included in the notice, such additional explanation was not expressly required by the Wildfire Emergency Order dated September 18, 2020.

For the foregoing reasons, we respectfully request that the aforementioned clarifications be included, should the Division decide to publish the April 5<sup>th</sup> cover letter with the Market Conduct Exam Report.

If you have any additional questions, please don't hesitate to contact me. Thank you.



Sincerely,



Sean F. O'Connor

