NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

			FOR NAIC USE ONLY
	DA	ATE: <u>12/16/2021</u>	Agenda Item # 2021-23BWG MOD
CONTACT PERSON:			Year <u>2022</u>
		_	Changes to Existing Reporting [X]
TELEPHONE:			New Reporting Requirement []
EMAIL ADDRESS:			REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT
ON BEHALF OF:			No Impact [X]
NAME:	Dala Pruggaman / C	Tannia Maang	Modifies Required Disclosure []
	Dale Bruggeman / C		DISPOSITION
TITLE:	Chair / Vice Chair S	SAPWG	[] Rejected For Public Comment
AFFILIATION:	OH and IA Dept of	Insurance	[] Referred To Another NAIC Group [] Received For Public Comment
		Insui unce	[X] Adopted Date <u>03/29/2022</u>
ADDRESS:			[] Rejected Date
			Image: Deferred Date Image: Date Image: Date Image: Date Image: Date
		_	
	BLANK(S)	TO WHICH PROPOSAL	APPLIES
[X] ANNUAL STA [] QUARTERLY		[X] INSTRUCTIONS [X] BLANK	[X] CROSSCHECKS
 [X] Life, Accident & Property/Casualt Health 		 [X] Separate Accounts Protected Cell Health (Life Supplement) 	[] Title [] Other
Anticipated Effective Date	e: Annual 2022		

IDENTIFICATION OF ITEM(S) TO CHANGE

Added a group of lines for Residual Tranches or Interests in the Asset Valuation Reserve Equity and Other Invested Asset Component blank and renumber lines below them. Modify instructions as appropriate for the added lines.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

With the new reporting lines proposed for residuals in Schedule BA, additional revisions are needed to map those reporting lines to the AVR schedule. The proposed revisions will separately capture these items in a new category within AVR as they are items that are not comparable to other investments. As defined in the AP&P Manual, residuals reflect loss layers without contractual interest or principal payments. Payments to holders of these investments occur after contractual interest and principal payments have been made to other tranches or interests and are based on the remaining available funds. Although payments to holders can occur throughout an investment's duration (and not just at maturity), such instances still reflect the residual amount permitted to be distributed after other holders have received contractual interest and principal payments.

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: The 2022 effective date will match the Schedule BA changes and the effective date for reporting on Schedule BA in the AP&P Manual.

Other Comments: This proposal assumes adoption of 2021-21BWG

** This section must be completed on all forms.

Revised 7/18/2018

ANNUAL STATEMENT INSTRUCTIONS – LIFE\FRATERNAL

EQUITY AND OTHER INVESTED ASSET COMPONENT -BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS **Detail Eliminated to Conserve Space** Lines 75 through 80 Low-Income Housing Tax Credit Investments Report Column 1 in accordance with SSAP No. 93-Low-Income Housing Tax Credit Property Investments. For Line 75, report guaranteed low-income housing tax credit (LIHTC) investments. There must be an all-inclusive guarantee from a CRP-rated entity that guarantees the yield on the investment. Line 75 should equal Schedule BA, Part 1, Column 12, Line 3599999 + Line 3699999. For Line 76, report non-guaranteed LIHTC investments with the following risk mitigation factors: I. A level of leverage below 50%. For LIHTC Fund, the level of leverage is measured at the fund level. II. There is a Tax Credit Guarantee Agreement from General Partner or managing member. This agreement requires the General Partner or managing member to reimburse investors for any shortfalls in tax credits due to errors of compliance, for the life of the partnership. For an LIHTC Fund, a Tax Credit Guarantee is required from the developers of the lower tier LIHTC properties to the upper tier partnership. III. There are sufficient operating reserves, capital replacement reserves and/or operating deficit guarantees present to mitigate foreseeable foreclosure risk at the time of the investment. Line 76 should equal Schedule BA, Part 1, Column 12, Line 3799999 + Line 3899999. Only federal low-income housing tax credit investments can be reported on Lines 75 and 76. State low-income housing tax credit investments that meet the requirements of SSAP No. 93 and that, at a minimum, meet the requirements for federal guaranteed programs should be reported on Line 77. Line 77 should equal Schedule BA, Part 1, Column 12, Line 3999999 + Line 4099999. State low-income housing tax credit investments that do not meet the requirements of SSAP No. 93 and that do not, at a minimum, meet the requirements for federal non-guaranteed programs should be reported on Line 78. Line 78 should equal Schedule BA, Part 1, Column 12, Line 4199999 + Line 4299999. Any other low-income housing tax credit investments that meet the requirements of SSAP No. 93 and cannot be reported on Lines 75 through 78 should be reported on Line 79. Line 79 should equal Schedule BA, Part 1, Column 12, Line 4399999 + Line 4499999. Multiply the amount in Column 4 for each category by the reserve factors for Page 34, Columns 5, 7 and 9, Lines 75 through 79. Report the products by category in Columns 6, 8 and 10, respectively. Lines 81 through 91 **Residual Tranches or Interests** Line 81 Fixed Income Instruments - Unaffiliated Report the book/adjusted carrying value of all Schedule BA assets in Line 4699999 in Columns 1 and 4. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7 and 9 and report the products in Columns 6, 8 and 10, respectively Line 82 Fixed Income Instruments - Affiliated

		Report the book/adjusted carrying value of all Schedule BA assets in Line 4799999 in Columns 1 and 4. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7 and 9 and report the products in Columns 6, 8 and 10, respectively.
Line 83	_	Common Stock – Unaffiliated
		Report the book/adjusted carrying value of all Schedule BA assets in Line 48999999 in Columns 1 and 4. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7 and 9 and report the products in Columns 6, 8 and 10, respectively.
Line 84	_	Common Stock – Affiliated
		Report the book/adjusted carrying value of all Schedule BA assets in Line 49999999 in Columns 1 and 4. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7 and 9 and report the products in Columns 6, 8 and 10, respectively.
Line 85	_	Preferred Stock – Unaffiliated
		Report the book/adjusted carrying value of all Schedule BA assets in Line 5099999 in Columns 1 and 4. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7 and 9 and report the products in Columns 6, 8 and 10, respectively.
Line 86	-	Preferred Stock – Affiliated
		Report the book/adjusted carrying value of all Schedule BA assets in Line 5199999 in Columns 1 and 4. Multiply the amount in Column 4 by the calculated reserve factors in Columns 5, 7 and 9 and report the products in Columns 6, 8 and 10, respectively.
Line 87	_	Real Estate – Unaffiliated
		Report the book/adjusted carrying value of all Schedule BA assets in Line 5299999 in Column 1, any related encumbrances on these assets in Column 2, and any third-party encumbrances on these assets in Column 3. Report the sum of Columns 1, 2, and 3 in Column 4. Column 4 may not be less than zero. Multiply the amount in Column 4 by the reserve factors provided in Columns 5, 7 and 9 and report the products in Columns 6, 8 and 10, respectively.
Line 88	_	Real Estate – Affiliated
		Report the book/adjusted carrying value of all Schedule BA assets in Line 53999999 in Column 1, any related encumbrances on these assets in Column 2, and any third-party encumbrances on these assets in Column 3. Report the sum of Columns 1, 2, and 3 in Column 4. Column 4 may not be less than zero. Multiply the amount in Column 4 by the reserve factors provided in Columns 5, 7 and 9 and report the products in Columns 6, 8 and 10, respectively.

Line 89	_	Mortgage Loans – Unaffiliated					
			ed carrying value of all Schedule BA assets in Line 54999999 in Columns 1 and in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products , respectively.				
Line 90	_	Mortgage Loans – Affi	liated				
			ed carrying value of all Schedule BA assets in Line 55999999 in Columns 1 and in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products , respectively.				
Line 91	_	Other – Unaffiliated					
			ed carrying value of all Schedule BA assets in Line 56999999 in Columns 1 and in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products , respectively.				
Line 92	_	Other – Affiliated					
			ed carrying value of all Schedule BA assets in Line 57999999 in Columns 1 and in Column 4 by the reserve factors in Columns 5, 7 and 9. Report the products , respectively.				
Line 94 & 95	_	Working Capital Finan	ce Investments				
		(Schedule BA, Part 1, investments into NAIC NAIC Investment Analy	isted carrying value of all working capital finance investments owned Line 4599999) in Columns 1 and 4. Categorize the working capital finance designations 1 or 2 as directed by the <i>Purposes and Procedures Manual of the</i> <i>trysis Office</i> . Multiply the amount in Column 4 for each designation by the reserve umns 5, 7 and 9, and report the products by designation in Columns 6, 8 and 10,				
Line 96	_	Other Invested Assets -	- Schedule BA				
		classified into one of 0699999, 0999999, 10 3499999, 5899999 and Schedule DL, Part 1 in classified in one of the intentionally excluded Column 1 is to be cald Report the sum of Colu- surplus debentures and rating equivalent to an schedule). Multiply the	ed carrying value of all other Schedule BA investments owned that cannot be the above categories (Lines 0199999, 0299999, 0399999, 0499999, 0599999, 99999, 1799999, 1899999, 2599999, 2699999, 2799999, 2899999, 3399999, 15999999) in Column 1 and any encumbrances on these assets in Column 3. Investments reported on Line 9409999999 would be included in this total if not e above categories. Collateral loans (Lines 2999999 and 3099999) have been from this total. For surplus debentures and capital notes, the amount to report in culated based upon the accounting prescribed in <i>SSAP No. 41—Surplus Notes</i> . Imms 1 and 3 in Column 4. Column 4 may not be less than zero. Note that ALL capital notes should be included here in Line 96, EXCEPT those with a CRP NAIC 1 or NAIC 2 designation (which are reported in Lines 30 and 31 of this e amount in Column 4 by the reserve factors provided in Columns 5, 7 and 9, in Columns 6, 8 and 10, respectively.				
		e i	All surplus debentures and capital notes that possess a CRP rating equivalent to in NAIC 1 or NAIC 2 designation. These surplus debentures are to be reported in Line 30 and 31 (Other Invested Assets with Underlying Characteristics of Preferred Stocks) of this schedule.				

Line 97 – Other Short-Term Invested Assets – Schedule DA

Report the book/adjusted carrying value of all other Schedule DA (Lines 7029999999 and 750999999) and Schedule DL, Part 1 (Line 950999999) assets owned that cannot be classified into one of the above categories in Column 1 and any encumbrances on these assets in Column 3. Report the sum of Columns 1 and 3 in Column 4. Multiply the amount on Column 4 by the reserve factors provided in Columns 5, 7 and 9 and report the products in Columns 6, 8 and 10, respectively.

Line 98 – Total Other Invested Assets – Schedules BA & DA

The Columns 6, 8 and 10 amounts must be combined with Columns 6, 8 and 10, Line 21 amounts and reported on the Asset Valuation Reserve Page, Column 5, Lines 7, 10 and 9, respectively.

- NOTE: Other invested asset reserves will be calculated based on the nature of the underlying investments related to the Schedule BA and Schedule DA assets. Assets should be categorized as if the company owned the underlying investment. For example:
 - Mortgage participation certificates and similar holdings should be classified as fixed income assets.
 - Gas and oil production and mineral rights have potential variability of return and should be categorized as equity investments.
 - Partnership investments should be classified as fixed or equity investments or as equity real estate, depending on the purpose of the partnership. The maximum AVR factor would be that appropriate for the asset classification.
 - A "look through" approach should be taken for any Schedule BA and Schedule DA assets not specifically listed, so as to reflect in the AVR calculation the essential nature of the investments.

<u>REPLICATION (SYNTHETIC) ASSETS –</u> BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS



Detail Eliminated to Conserve Space

Basic	Contrib	ution:

G/A Page 29, Line 7, Column 1 =	G/A	[P31, L34, C6]	+ G/A	[P36, L0199999, C7]
	+ S/A	[P16, L34, C6]	+ S/A	[P21, L0199999, C7]
G/A Page 29, Line 7, Column 2 =	G/A	[P32, L60, C6]	+ G/A	[P36, L02999999, C7]
	+ S/A	[P17, L60, C6]	+ S/A	[P21, L02999999, C7]
G/A Page 29, Line 7, Column 4 =	G/A	[P33, L17, C6]	+ G/A	[P36, L03999999, C7]
	+ S/A	[P18, L17, C6]	+ S/A	[P21, L03999999, C7]
G/A Page 29, Line 7, Column 5 =	G/A	[P33, L21, C6 + P35, 99, C6]	+ G/A	[P36, L0499999, C7]
	+ S/A	[P18, L21, C6 + P20, 99, C6]	+ S/A	[P21, L0499999, C7]
Reserve Objective:				

Reserve Objective:

G/A Page 29, Line 10, Column 1 =	G/A	[P31, L34, C8]	+ G/A	[P36, L0199999, C8]
	+ S/A	[P16, L34, C8]	+ S/A	[P21, L0199999, C8]
C/A Data 20 Line 10 Calumn 2 -				[D26 1 0200000 C9]
G/A Page 29, Line 10, Column 2 =	G/A	[P32, L60, C8]	+ G/A	[P36, L0299999, C8]
	+ S/A	[P17, L60, C8]	+ S/A	[P21, L0299999, C8]
G/A Page 29, Line 10, Column 4 =	G/A	[P33, L17, C8]	+ G/A	[P36, L0399999, C8]
	+ S/A	[P18, L17, C8]	+ S/A	[P21, L0399999, C8]
			- Dill	[121, 2000000, 20]
G/A Page 29, Line 10, Column 5 =	G/A	[P33, L21, C8 + P35, 99, C8]	+ G/A	[P36, L0499999, C8]
O/A r age 27, Ente 10, Column 5 –				L / / J
	+ S/A	[P18, L21, C8 + P20, 99, C8]	+ S/A	[P21, L0499999, C8]

Maximum Reserve:

G/A Page 29, Line 9, Column 1 =	G/A	[P30, L34, C10]	+ G/A	[P36, L0199999, C9]
	+ S/A	[P15, L34, C10]	+ S/A	[P21, L0199999, C9]
G/A Page 29, Line 9, Column 2 =	G/A	[P33, L60, C10]	+ G/A	[P36, L0299999, C9]
	+ S/A	[P18, L60, C10]	+ S/A	[P21, L0299999, C9]
G/A Page 29, Line 9, Column 4 =	G/A	[P33, L17, C10]	+ G/A	[P36, L0399999, C9]
	+ S/A	[P18, L17, C10]	+ S/A	[P21, L0399999, C9]
G/A Page 29, Line 9, Column 5 =	G/A	[P33, L21, C10 + P34, 99, C10]	+ G/A	[P36, L04999999, C9]
	+ S/A	[P18, L21, C10 + P19, 99, C10]	+ S/A	[P21, L04999999, C9]
¥	Detail E	liminated to Conserve Space		¥

		ASSET VALUATION RESERVE
1		
¥		Detail Eliminated to Conserve Space
Line 7 – Ba	asic Contril	bution (includes separate accounts assets, if applicable)
		asic contribution amount for each asset category as calculated on Pages 30 through 35 count) and Pages 15 through 20 (Separate Accounts).
Co	olumn 1:	Report the total bonds, preferred stock, short-term investments and derivative instruments from Page 30, Line 34, Column 6 (General Account) and Page 15, Line 34, Col. 6 (Separate Accounts), if applicable; and the total for replication (synthetic asset) transactions contained on Page 35, Line 0199999, Column 7 (General Account) and Page 20, Line 0199999, Column 7 (Separate Accounts).
Ca	olumn 2:	Report the total mortgage loans from Page 31, Line 60, Column 6 (General Account) and Page 16, Line 60, Col. 6 (Separate Accounts), if applicable; and the total for replication (synthetic asset) transactions contained on Page 35, Line 0299999, Column 7 (General Account) and Page 20, Line 0299999, Column 7 (Separate Accounts).
Co	olumn 4:	Report the total common stock from Page 32, Line 17, Column 6 (General Account) and Page 17, Line 17, Col. 6 (Separate Accounts), if applicable; and the total for replication (synthetic asset) transactions contained on Page 35, Line 0399999, Column 7 (General Account) and Page 20, Line 0399999, Column 7 (Separate Accounts).
Co	olumn 5:	Report the total real estate from Page 32, Line 21, Column 6 (General Account) and from Page 17, Line 21, Column 6 (Separate Accounts), if applicable, plus the total other invested assets from Page 34, Line 99, Column 6 (General Account) and from Page 19, Line 99, Column 6 (Separate Accounts), if applicable; and the total for replication (synthetic asset) transactions contained on Page 35, Line 0499999, Column 7 (General Account) and Page 20, Line 0499999, Column 7 (Separate Accounts).
Line 9 – M	laximum Ro	eserve (includes separate accounts assets, if applicable)
	-	haximum reserve for each asset category as calculated on Pages 30 through 35 (General 1 Pages 15 through 20 (Separate Accounts).
Ca	olumn 1:	Report the total bonds, preferred stock, short-term investments and derivative instruments from Page 30, Line 34, Column 10 (General Account) and Page 15, Line 34, Col. 10 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page 35, Line 0199999, Column 9 (General Account) and Page 20, Line 0199999, Column 9 (Separate Accounts).
Ca	olumn 2:	Report the total mortgage loans from Page 31, Line 60, Column 10 (General Account) and Page 16, Line 60, Col. 10 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page 35, Line 0299999, Column 9 (General Account) and Page 20, Line 0299999, Column 9 (Separate Accounts).
Co	'olumn 4:	Report the total common stock from Page 32, Line 17, Column 10 (General Account) and Page 17, Line 17, Col. 10 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page 35, Line 0399999, Column 9 (General Account) and Page 20, Line 0399999, Column 9 (Separate Accounts).

	Column 5:	Report the total real estate from Page 32, Line 21, Column 10 (General Account) and from Page 17, Line 21, Column 10 (Separate Accounts), if applicable, plus the total other invested assets from Page 34, Line 99, Column 10 (General Account) and from Page 19, Line 86, Column 10 (Separate Accounts), if applicable; and the total for replication (synthetic asset) transactions contained on Page 35, Line 0499999, Column 9 (General Account) and Page 20, Line 0499999, Column 9 (Separate Accounts).
Line 10 –	Reserve Obj	ective (includes separate accounts assets, if applicable)
	-	reserve objective amount for each asset category as calculated on Pages 30 through 35 acount) and Pages 15 through 20 (Separate Accounts).
	Column 1:	Report the total bonds, preferred stock, short-term investments and derivative instruments from Page 30, Line 34, Column 8 (General Account) and Page 15, Line 34, Column 8 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page 35, Line 0199999, Column 8 (General Account) and Page 20, Line 0199999, Column 8 (Separate Accounts).
	Column 2:	Report the total mortgage loans from Page 31, Line 60, Column 8 (General Account) and Page 16, Line 60, Col. 8 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page 35, Line 0299999, Column 8 (General Account) and Page 20, Line 0299999, Column 8 (Separate Accounts).
	Column 4:	Report the total common stock from Page 32, Line 17, Column 8 (General Account) and Page 17, Line 17, Col. 8 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page 35, Line 0399999, Column 8 (General Account) and Page 20, Line 0399999, Column 8 (Separate Accounts).
	Column 5:	Report the total real estate from Page 32, Line 21, Column 8 (General Account) and from Page 17, Line 21, Column 8 (Separate Accounts), if applicable; plus the total other invested assets from Page 34, Line 99, Column 8 (General Account) and from Page 19, Line 99, Column 8 (Separate Accounts), if applicable and the total for replication (synthetic asset) transactions contained on Page 35, Line 0499999, Column 8 (General Account) and Page 20, Line 0499999, Column 8 (Separate Accounts).
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ANNUAL STATEMENT BLANK – LIFE\FRATERNAL AND SEPARATE ACCOUNTS

ASSET VALUATION RESERVE (Continued) BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS EQUITY AND OTHER INVESTED ASSET COMPONENT

			1	2	3	4	Basic Contribution		Reserve Objective		Maximum Reserve	
			Book/			Balance for	5	6	7	8	9	10
	NAIC		Adjusted	Reclassify	Add	AVR Reserve						
Line	Desig-	D as later	Carrying	Related Party Encumbrances	Third Party Encumbrances	Calculations (Cols, 1+2+3)	T	Amount (Cols, 4x5)	E. t.	Amount (Cols, 4x7)	E. t	Amount (Cols, 4x9)
Number	nation	Description INVESTMENTS WITH THE UNDERLYING	Value	Encumbrances	Encumbrances	(Cols. 1+2+3)	Factor	(Cols. 4x5)	Factor	(Cols. 4X/)	Factor	(Cols. 4x9)
		CHARACTERISTICS OF COMMON STOCK										
65		Unaffiliated Public		XXX	XXX		0.0000		0.1580(a)		0.1580(a)	
66		Unaffiliated Private		XXX	XXX		0.0000		0.1945		0.1945	
67		Affiliated Life with AVR.		XXX	XXX		0.0000		0.0000		0.0000	
68		Affiliated Certain Other (See SVO Purposes & Procedures Manual)		XXX	XXX		0.0000		0.1580		0.1580	
69		Affiliated Other - All Other		XXX	XXX		0.0000		0.1945		0.1945	
70		Total with Common Stock Characteristics									0.000	
,,,		(Sum of Lines 65 through 69)		XXX	XXX		XXX		XXX		XXX	
		INVESTMENTS WITH THE UNDERLYING										
		CHARACTERISTICS OF REAL ESTATE										
71		Home Office Property (General Account only)					0.0000		0.0912		0.0912	
72		Investment Properties					0.0000		0.0912		0.0912	
73		Properties Acquired in Satisfaction of Debt					0.0000		0.1337		0.1337	
74		Total with Real Estate Characteristics		1								
		(Sum of Lines 71 through 73)					XXX		XXX		XXX	
		LOW INCOME HOUSING TAX CREDIT INVESTMENTS										
75		Guaranteed Federal Low-Income Housing Tax Credit					0.0003		0.0006		0.0010	
76		Non-guaranteed Federal Low-Income Housing Tax Credit					0.0063		0.0120		0.0190	
77							0.0003		0.0006		0.0010	
78		Non-guaranteed State Low Income Housing Tax Credit					0.0063		0.0120		0.0190	
79		All Other Low-Income Housing Tax Credit					0.0273		0.0600		0.0975	
80		Total LIHTC (Sum of Lines 75 through 79)					XXX		XXX		XXX	
		RESIDUAL TRANCHES OR INTERESTS										
81		Fixed Income Instruments - Unaffiliated		XXX	XXX		0.0000		0.1580		0.1580	
82		Fixed Income Instruments - Affiliated		XXX	XXX		0.0000		0.1580		0.1580	
83		Common Stock - Unaffiliated		XXX	XXX		0.0000		0.1580		0.1580	
84		Common Stock - Affiliated		XXX	XXX		0.0000		0.1580		0.1580	
85		Preferred Stock - Unaffiliated		XXX	XXX		0.0000		0.1580		0.1580	
86		Preferred Stock - Affiliated		XXX	XXX		0.0000		0.1580		0.1580	
87		Real Estate - Unaffiliated					0.0000		0.1580		0.1580	
88		Real Estate – Affiliated					0.0000		0.1580		0.1580	
89		Mortgage Loans – Unaffiliated		XXX	XXX		0.0000		0.1580		0.1580	
90		Mortgage Loans – Affiliated		XXX	XXX		0.0000		0.1580		0.1580	
91		Other – Unaffiliated Other – Affiliated		XXX	XXX		0.0000		0.1580		0.1580	
92				XXX	XXX		0.0000	l	0.1580	l	0.1580	l
93		Total Residual Tranches or Interests (Sum of Lines 81 through 92)										
23		ALL OTHER INVESTMENTS										
94		ALL OTHER INVESTMENTS NAIC 1 Working Capital Finance Investments		XXX			0.0000		0.0042		0.0042	
94		NAIC 1 Working Capital Finance Investments		XXX			0.0000		0.0042		0.0042	
95		Other Invested Assets - Schedule BA		XXX			0.0000		0.1580		0.1580	
97		Other Short-Term Invested Assets - Schedule DA		XXX			0.0000		0.1580		0.1580	
98		Total All Other (Sum of Lines 94, 95, 96 and 97)		XXX			XXX	1	XXX	1	XXX	1
99 99		Total Other Invested Assets - Schedules BA & DA							7777		7777	
22		(Sum of Lines 29, 37, 64, 70, 74, 80, 92 and 98)					XXX		XXX		XXX	
		(Sum of Lines 29, 57, 04, 70, 74, 60, 92 and 96)					ΛΛΛ	1	ллл	1	ллл	1

(a)

(b) (c)

Times the company's weighted average portfolio beta (Minimum .1215, Maximum .2431). Determined using same factors and breakdowns used for directly owned real estate. This will be the factor associated with the risk category determined in the company generated worksheet.

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