

NOVA SCOTIA REGULATORY AND APPEALS BOARD

IN THE MATTER OF THE INSURANCE ACT

- and -

IN THE MATTER OF AN APPLICATION by **TD INSURANCE GROUP** for approval to change its underwriting rules for private passenger vehicles, commercial vehicles and miscellaneous vehicles

BEFORE: Julia E. Clark, LL.B., Vice Chair

APPLICANT: **TD INSURANCE GROUP**

FINAL SUBMISSIONS: August 21, 2026

DECISION DATE: **October 13, 2026**

DECISION: **Application is approved.**

I INTRODUCTION

[1] TD Insurance Group (TD), which represents Security National Insurance Company, Primmum Insurance Company and TD Home and Auto, applied to the Nova Scotia Regulatory and Appeals Board (Board) to change its underwriting and rating rules for private passenger, commercial (for Security National) and miscellaneous vehicles.

[2] The Board must consider whether rates and risk-classification systems are just and reasonable and in compliance with the *Insurance Act (Act)* and its *Regulations*. The Board is satisfied that TD's application meets these requirements and approves the proposed rule changes.

II ANALYSIS

[3] TD applied under the Board's *Rate Filing Requirements for Automobile Insurance – Section 155G Prior Approval (Rate Filing Requirements)*. Since the filing of this application, TD received and responded to Information Requests (IRs) from Board staff. Board staff prepared a report to the Board with recommendations on the application (Staff Report). Before providing the Staff Report to the Board, Board staff shared it with TD. The company reviewed the report and informed Board staff that it had no comments.

[4] The Board will examine the following proposed underwriting and rating rules changes in this decision:

- Additions to the Serious Convictions List
- Revisions to Minor and Major Convictions List
- Additions to two definitions to the Manual

Additions to the Serious Convictions List

[5] TD seeks to add the following to its list of Serious Convictions in its underwriting rules:

- *Driver in the Alcohol Ignition Interlock Program operating a vehicle not so equipped*
- *Failure to install and maintain a functioning Alcohol Ignition Interlock Device when required as a condition of driver's license reinstatement*

[6] These types of convictions represent failures to follow a court-ordered practice and may attract criminal consequences. If these convictions are not listed in the manual, TD believes that it may not be able to properly identify and rate drivers who fail to comply with ignition interlock requirements. Once they are added to the Serious Convictions list, the convictions attract surcharges if the company chooses to underwrite the risk. The company may also opt to decline to write the policy as too risky.

[7] Security National is the only company in the TD Group that writes commercial vehicles. Because commercial vehicles use the same conviction classifications as private passenger vehicles, the changes to Serious Convictions apply to commercial vehicles insured by Security National. The changes apply to private passenger and miscellaneous vehicles for all three companies.

[8] The Board approves these changes, as well as the other editorial and administrative changes to the underwriting and rating rules in the Manual, and those addressed in the next sections of this decision.

Revisions to Minor and Major Convictions List

[9] TD proposed to add "*Failing to obey the directions of a peace officer*" to the list of Minor Convictions. TD treats moving traffic offences that are not already listed under

“Serious Convictions” or “Major Convictions” as Minor Convictions, so this change clarifies its practice without changing how the conviction is classified.

[10] TD also included changes to its list of Major Convictions to clarify wording and identify the conviction of “*Improper passing/speeding in a school or playground zone*” as a separate conviction than “*Improper passing of a school bus,*” which is already listed as a Major Conviction.

[11] The changes do not violate the *Act* or *Regulations*. The Board notes they do not result in changes to rates or the risk classification system.

New Definitions

[12] TD proposed to add a definition for “Commercial Vehicle/ Commercial Use” to provide greater clarity and ensure consistent interpretation of business use and commercial use within the underwriting manual. The definition does not change how any vehicle is rated nor the underwriting intent.

[13] TD also added a definition of “acceptable anti-theft device.” The definition requires the device to be professionally installed and limits aftermarket options for tracking devices to TAG, KYCS Locate, Vinlock/Domino, and CarRX by ELO GPS and car immobilizers to Autowatch Ghost 2, IGLA, Viper, and Cellutrak - Option 3 level of security: 2 Unit Ultimate Solution (Starlink + Shadow).

[14] TD said it added the definition to establish a transparent standard for the anti-theft technologies that the company will recognize. Including the definition supports the sections of the manual that reference anti-theft devices by providing a definition of the

devices that meet TD's requirements. The underwriting provisions referring to anti-theft devices are read in conjunction with this definition.

[15] The changes do not violate the *Act* or *Regulations*. The Board notes they do not result in changes to rates or the risk classification system.

III SUMMARY

[16] The Board finds that the application follows the *Act* and *Regulations*, as well as the *Rate Filing Requirements*.

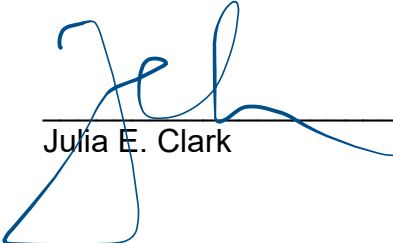
[17] The application maintains rates and risk classification systems for TD Group that the Board finds just and reasonable. The Board approves the changes effective October 29, 2026, for new business and December 14, 2026, for renewal business.

[18] Board staff reviewed the revised Automobile Insurance Manual submitted with this application, as well as the current Manual filed with the Board, and did not find any instances where the Manual contravened the *Act* or *Regulations*. TD Group must file an electronic version of its Manual, updated for the changes approved in this decision, within 30 days of the issuance of the order in this matter.

[19] The application does not qualify to set a new mandatory filing date under the *Mandatory Filing of Automobile Insurance Rates Regulations*. The mandatory filing date for TD Group for private passenger vehicles as well as Security National for commercial vehicles remains August 1, 2027, and the mandatory filing date for miscellaneous vehicles stays at June 1, 2028.

[20] An order will issue accordingly.

DATED at Halifax, Nova Scotia, this 13th day of October 2026.



Julia E. Clark