



To: Hon. Ricardo Lara, Hon. Lori Wingier, Aaron Brandenburg (NAIC)

From: United Policyholders

Date: December 20, 2023

Re: National Climate Resilience Strategy for Insurance

United Policyholders appreciates the time and effort the NAIC is putting into strategizing around the impact of climate change, te4(g)-7(eaen14(o)6(r)lo)7e,9u Q q 0.0000e eve4(g)hanc46 m

- 6) Continue developing the Catastrophe Modeling Center of Excellence ~~to~~ ^{provide} state insurance regulatory agencies ~~with~~ ^{enhanced} capacity ~~to~~ ^{review} rate filings that incorporate catastrophe models and overcome trade secret claims by catastrophe modelers.
- 7) Examine new policy language that departs from the Standard Form Fire Policy limiting or excluding water, mold, smoke, hail and/or wind damage and issue findings on recommended limits ~~on~~ ^{the} validity of the language and ~~to~~ ^{impose} those limits and exclusions⁴.
- 8) Evaluate and endorse the most viable ~~to~~ ^{proposal} to create a Federal Catastrophe Reinsurance program⁵.
- 9) Examine postwildfire claim handling reform ~~to~~ ^{legislation} that has been implemented in California, Oregon, Washington and Colorado ~~and~~ ^{create} a model for other states to adopt. They include:
 - a. Requiring policies to provide additional (temporary) living expense benefits of up to 36 months to reflect the reality that homes cannot realistically be rebuilt within 12 months after a disaster.
 - b. Requiring policies that provide Replacement Cost Value coverage to give the policyholder the option of applying their benefits toward the purchase or rebuild of a replacement home not at the original loss location. This helps people avoid rebuilding in an area vulnerable to severe weather events and/or future wildfires, storm surge, etc.

Respectfully submitted,



Amy Bach, Executive Director
NAIC Consumer Representative, Federal Advisory Committee on Insurance

⁴ <https://uphelp.org/restoring-the-insurancesafetynetcoalition-risc-a-nationalinitiative/>

⁵ <https://uphelp.org/wp-content/uploads/2023/12/BackNATCAINAIGFall2023-ConsumerLiaison.pdf>