

January 3, 2025

Kara Voss – Model Advisor

California Department of Insurance
300 Capitol Mall, 16th Floor
Sacramento, CA 95814

Model Advisor Voss,

On behalf of Moody's, a worldwide leader in providing data, intelligence, and analytical tools to help businesses and financial leaders make informed and confident decisions about risk for over 115 years, I hereby request the initiation and participation of the PRID procedure for the Moody's North America Wildfire Models Version 2.0 (hereby referred to as the 'Moody's Wildfire Model').

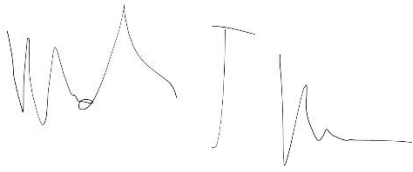
In accordance with the California Insurance Department Regulation, *Section 2644.4.5. Use of Catastrophe Models*, the Moody's Wildfire Model conforms to the standards of practice set forth by the Actuarial Standards Board and is based upon accurate and reliable methods of estimating risk for California. Moody's also complies with Section 2648.5(h)(3), as there is currently no valid PRID, and that the model not yet been previously subject to public review in any other forum in California, including without limitation as part of a complete rate application, within the prior four years.

Moody's Wildfire modeling accurately characterizes fires as they start and travel due to factors that drive ignition and spread, including wind and presence of vegetation. This helps insurers, reinsurers, governments, and financial institutions differentiate safe structures from dangerous ones, conduct risk assessments, estimate potential losses, accurately price fire risk, and optimize risk transfer.

Moody's derived the methodologies used in developing the wildfire model components in collaboration with researchers and experts in different areas of specialty, including historical fire incidents datasets, fire occurrence modeling, fire spread, and damage mitigation. The model includes a comprehensive range of stochastic wildfire events from all sources, including explicit representation of utility-triggered wildfires, and accounts for fire, ember, urban conflagration, and smoke risk, over a wide geographic extent, at high resolution. The wildfire vulnerability module supports a comprehensive range of risk classes, calibrated using extensive claims data. In addition, the financial module brings all the benefits of simulation framework, while additional flexible modeling options enable users to explore sensitivity of loss results to various modeling assumptions.

Moody's appreciates the consideration of the initiation and participation of the PRID for the Moody's Wildfire Model and commits to timely and collaborative participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Nielsen', with a stylized, cursive script.

Matthew Nielsen

Senior Vice President – Government, Public, and Regulatory Affairs

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