

1 Harvey Rosenfield, SBN 123082
William Pletcher, SBN 212664
2 Ryan Mellino, SBN 342497
3 CONSUMER WATCHDOG
6330 San Vicente Boulevard, Suite 250
4 Los Angeles, CA 90048
Tel. (310) 392-0522
5 Fax (310) 861-0862
6 harvey@consumerwatchdog.org
will@consumerwatchdog.org
7 ryan@consumerwatchdog.org

8 *Attorneys for Consumer Watchdog*

9
10 BEFORE THE INSURANCE COMMISSIONER
11 OF THE STATE OF CALIFORNIA

12 In the Matter of the PRID Procedure of:

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14 Moody's.
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File No.:

**CONSUMER WATCHDOG'S PETITION TO
PARTICIPATE AND NOTICE OF INTENT TO
SEEK COMPENSATION**

[Ins. Code §1861.10; Cal. Code Regs, tit. 10,
§§ 2648.5(h), 2661.4]

1 Consumer Watchdog submits this petition to participate in the pre-application required
2 information determination (“PRID”) procedure involving Moody’s. This PRID procedure, noticed by
3 the Model Advisor on January 23, 2025, is currently before the California Department of Insurance
4 (“CDI”). This petition is based on the facts as set forth below and the accompanying verification of
5 William Pletcher.

6 Consumer Watchdog also gives notice of its intent to seek compensation for its participation in
7 this PRID procedure, and, pursuant to California Code of Regulations, title 10 (“10 CCR”), sections
8 2661.4(a) and 2661.3, subdivision (c), Consumer Watchdog has submitted its proposed budget, attached
9 as Exhibit A.

10 **I. MOODY’S PETITION TO INITIATE PRID PROCEDURE**

11 1. On January 3, 2025, Moody’s submitted a Petition to Initiate a PRID Procedure for the
12 Moody’s North America Wildfire Models Version 2.0 (the “Model”) and to establish its right to
13 participate in the PRID procedure. In its Petition, Moody’s asserts that the Model “conforms to the
14 standards of practice set forth by the Actuarial Standards Board and is based upon accurate and reliable
15 methods of estimating risk for California.” Moody’s further claims that the Model “helps insurers,
16 reinsurers, governments, and financial institutions differentiate safe structures from dangerous ones,
17 conduct risk assessments, estimate potential losses, accurately price fire risk, and optimize risk transfer.”
18 Moody’s verified that “there is currently no valid PRID, and that the model [has] not yet been previously
19 subject to public review in any other forum in California, including without limitation as part of a
20 complete rate application, within the prior four years.”

21 2. The Model Advisor apparently granted Moody’s Petition in a letter dated January 17,
22 2025, and subsequently posted this letter granting the requested PRID procedure on the CDI’s website
23 on January 23, 2025.¹

24 **II. CONSUMER WATCHDOG’S OBJECTION TO THE PRID PROCEDURE AND LACK**
25 **OF PUBLIC NOTICE**

26 3. There was no meaningful public notice or disclosure of Moody’s Petition or the Model
27 Advisor’s January 17 letter. Consumer Watchdog only became aware of the Moody’s PRID Petition by
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¹ See <https://www.insurance.ca.gov/01-consumers/180-climate-change/DetermineProcedure.cfm>.

1 conducting a search for “PRID” on CDI’s website after seeing an industry news article stating that
2 another company had requested review of its model,² and then continuing to monitor the CDI website
3 daily for any determination to grant the PRID Petition and notice of a PRID procedure.³ Haphazard
4 publication of petitions and letters, available only through website searches, with no public notice or
5 central posting location, is not only inconsistent with typical CDI public notice practices (including
6 press releases), but appears designed to hide the PRID procedure from the public to limit the public’s
7 ability to exercise its right to participate in PRID procedures. Through its participation in this PRID
8 procedure, Consumer Watchdog does not intend to waive its objection to this lack of meaningful public
9 notice, and believes that the Model Advisor should repost and publicly notice the PRID Petition and its
10 own response in accord with typical CDI public notice practices, to allow the public to have meaningful
11 notice and reasonable time to evaluate the PRID Petition to determine whether to participate.

12 **III. PETITIONER CONSUMER WATCHDOG**

13 4. Petitioner Consumer Watchdog is a nonprofit, nonpartisan, public interest corporation
14 organized to represent the interests of consumers and taxpayers. A core focus of Consumer Watchdog’s
15 advocacy is the representation of the interests of insurance consumers and policyholders, particularly as
16 they relate to the implementation and enforcement of Proposition 103, in matters before the Legislature,
17 the courts, and the CDI.

18 5. Consumer Watchdog’s founder authored Proposition 103 and led the successful
19 campaign for its enactment by California voters in 1988. Consumer Watchdog’s staff and consultants
20 include some of the nation’s foremost consumer advocates and experts on insurance ratemaking matters.

21 6. Consumer Watchdog has served as a public watchdog with regard to insurance rates and
22 insurer rollback liabilities under Proposition 103 by: monitoring rollback settlements and the status of
23 the rollback regulations; reviewing and challenging rate filings made by insurers seeking excessive
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25 _____
26 ² See <https://www.lifeinsuranceinternational.com/news/verisk-wildfire-catastrophe-model-california/?cf-view>.

27 ³ At a minimum, the Department should implement an email notification system allowing interested
28 parties to sign up for notifications of PRID submissions. Such a system is already in place for rate filings
and rulemaking proceedings and is just as critical to the public interest here. Once established, the new
notification system should be publicized in a press release.

1 rates; participating in rulemaking and adjudicatory hearings before the CDI; and educating the public
2 concerning industry underwriting and rating practices, their rights under Proposition 103, and other
3 provisions of state law. Consumer Watchdog has also initiated and intervened in actions in state court
4 and appeared as amicus curiae in matters involving the interpretation and application of Proposition 103
5 and the Insurance Code.⁴

6 7. Consumer Watchdog has initiated and intervened in numerous proceedings before the
7 CDI related to the implementation and enforcement of Proposition 103’s reforms, including over 150
8 rate and rulemaking proceedings in the last twenty years. In every proceeding that has resulted in a final
9 decision and in which Consumer Watchdog sought and was awarded compensation, the Commissioner
10 found that Consumer Watchdog made a substantial contribution, meaning that it presented relevant
11 issues, evidence, and arguments that resulted in more credible, non-frivolous information being
12 available to the Commissioner in making his final decision.

13 **IV. ELIGIBILITY TO SEEK COMPENSATION**

14 8. The Commissioner issued Consumer Watchdog’s latest Finding of Eligibility on
15 August 2, 2024, effective in proceedings commenced within two years of July 12, 2024. Consumer
16 Watchdog was previously found eligible to seek compensation on July 26, 2022, effective as of July 12,
17 2022; August 25, 2020, effective as of July 12, 2020; July 12, 2018; July 14, 2016; July 24, 2014;
18 July 24, 2012; July 2, 2010; August 25, 2008; July 14, 2006; July 2, 2004; June 20, 2002; October 1,
19 1997; September 26, 1995; September 27, 1994; and September 13, 1993. Consumer Watchdog is
20 eligible to seek compensation in this PRID procedure.

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24 ⁴ For example, *Calfarm Ins. Co. v. Deukmejian* (1989) 48 Cal.3d 805; *20th Century Ins. Co. v.*
25 *Garamendi* (1994) 8 Cal.4th 216; *Amwest Surety Ins. Co. v. Wilson* (1995) 11 Cal.4th 1243; *Proposition*
26 *103 Enforcement Project v. Quackenbush* (1998) 64 Cal.App.4th 1473; *Spanish Speaking Citizens’*
27 *Found. v. Low* (2000) 85 Cal.App.4th 1179; *Donabedian v. Mercury Ins. Co.* (2004) 116 Cal.App.4th
28 *968*; *State Farm Mut. Auto. Ins. Co. v. Garamendi* (2004) 32 Cal.4th 1029; *The Found. for Taxpayer*
and Consumer Rights v. Garamendi (2005) 132 Cal.App.4th 1354; *Ass’n of Cal. Ins. Cos. v. Poizner*
(2009) 180 Cal.App.4th 1029; *Mercury Cas. Co. v. Jones* (2017) 8 Cal.App.5th 561; *Mercury Ins. Co. v.*
Lara (2019) 35 Cal.App.5th 82; and *State Farm General Ins. Co. v. Lara* (2021) 71 Cal.App.5th 197.

1 **V. INTEREST OF CONSUMER WATCHDOG IN THE PRID PROCEDURE**

2 9. Consumer Watchdog’s overarching interest in the above-captioned proceeding is to
3 ensure that the models used by insurers in ratemaking are reliable and consistent with Prop 103’s
4 statutory requirements and underlying goals. Specifically, Consumer Watchdog’s participation in this
5 PRID procedure is aimed at ensuring that the ultimate PRID includes the necessary information and data
6 regarding the Moody’s Model that must be submitted with any future rate application relying on the
7 Model to ensure that homeowners policyholders are charged rates and premiums that comply with
8 Insurance Code section 1861.05(a)’s requirement that “no rate shall be approved or remain in effect
9 which is excessive, inadequate, [or] unfairly discriminatory or otherwise in violation of this chapter,”
10 and are also consistent with Prop 103’s “ultimate goal[, which] is the guaranty that ‘insurance is fair,
11 available, and affordable for all Californians.’” (*20th Century Ins. Co. v. Garamendi* (1994) 8 Cal.4th
12 216, 300.) For many homeowners, their home is their most valuable asset, and they are required to
13 purchase homeowners insurance by their mortgage lenders. Consumers who are overcharged by insurers
14 for this insurance coverage and who have been denied homeowners coverage or nonrenewed are part of
15 Consumer Watchdog’s core constituency. Consumer Watchdog also has an interest in ensuring that all
16 information provided to the Commissioner in support of rate applications, including catastrophe models
17 used to project losses and determine rates, premiums, and eligibility, are made publicly available as
18 required by Insurance Code section 1861.07.

19 10. Consumer Watchdog’s staff and consultants have substantial experience and expertise in
20 representing the interests of consumers in insurance rate matters, as well as advocating for consumer
21 interests in insurance rulemaking proceedings, and as such, Consumer Watchdog believes its
22 participation in the PRID procedure will provide a distinct perspective to aid the Model Advisor in
23 issuing the ultimate PRID.

24 **VI. POSITION OF PETITIONER ON SPECIFIC ISSUES**

25 11. Pursuant to Insurance Code section 1861.05, subdivision (b) and 10 CCR § 2648.4,
26 “every insurer that desires to change any rate must file a complete rate application which must include
27 the information required by Insurance Code section 1861.05, subdivision (b), and all information as the
28 Commissioner may require in order to perform a complete analysis of a rate application, including but

1 not limited to the exhibits, data, information, materials and documentation specified by Sections 2641.1
2 through 2643.8 and Sections 2644.1 through 2644.28” and “all of the materials described in subdivisions
3 (b) through (e) of [] Section 2648.4.” 10 CCR § 2648.4(c) delineates that a complete rate application
4 shall include “any and all criteria, guidelines, systems, manuals, models and algorithms, and any
5 proposed changes thereto, an insurer, agent, broker, or underwriter uses or relies upon to determine the
6 rate, rating rules and coverages for any particular applicant or insured, including optional coverage rates
7 and rules.” The purpose of this PRID procedure is to reach a determination “that specifies all
8 information and data regarding a model that are required to be provided to the Commissioner as part of a
9 complete rate application that relies upon the model for purposes of requesting a proposed rate change
10 pursuant to Insurance Code section 1861.05.” (10 CCR §§ 2648.5(a)(1), 2648.5(c).) “Required model
11 information,” according to the regulation, “means all required information and data regarding a model,
12 that the Commissioner requires to be submitted as part of a complete rate application that relies upon the
13 model, because such information and data will aid the Commissioner in determining whether the model
14 is reliable to perform the functions for which an insurer proposes to use the model, for purposes of the
15 Commissioner’s evaluation of a complete rate application.” (10 CCR 2648.5(a)(4).) Additionally,
16 “[r]equired model information shall include information that demonstrates the model uses established
17 concepts, data, equations, and principles, as well as best available scientific information and data,
18 insurance claims expertise, and other assumptions appropriate for the risk or peril being modeled.”
19 (10 CCR 2648.5(b).) Consumer Watchdog intends to participate fully in this PRID procedure to seek
20 and examine information and data regarding the financial and scientific components of the Moody’s
21 Model and to provide the input of its experts to opine on what information and data should be required
22 to be submitted as part of a complete rate application that will ultimately aid the Commissioner and
23 intervenors in determining its reliability during the rate review process.

24 12. During the PRID procedure, Consumer Watchdog intends to propound reasonable and
25 focused discovery, proffer expert testimony, and cross-examine other parties’ experts regarding the
26 reliability of the Moody’s Model, and understand Moody’s position on what constitutes “required model
27 information.” Consumer Watchdog’s position, prior to any discovery, is that the information and data
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1 regarding the Moody's Model to be sought through discovery and elicited through testimony should
2 include, but not be limited to:

3 Data

- 4 • the model's input variables, how those particular input variables were selected, and
5 quantifiable metrics demonstrating the variables' relative predictive power;
- 6 • input variables that were considered but ultimately rejected, and the reasons for rejection;
- 7 • the training dataset used in the construction of the model, including the data sources,
8 number of individual records, span of years, geospatial level of granularity, treatment of
9 deductibles, and treatment of reinsurance;
- 10 • whether the training dataset is refreshed and the model re-trained periodically, and how
11 often this occurs; and
- 12 • any assumptions made with respect to the input variables, the training dataset, or any
13 other aspect of the model's construction;

14 Model Operation

- 15 • the relative weights assigned to each input variable and how those weights were
16 determined;
- 17 • any quantifiable margins of error or tolerance associated with the model output;
- 18 • any assumptions made with respect to the model's operation and/or data output;
- 19 • whether and how the model controls for overfitting;
- 20 • how elements that tend to fluctuate in value and have a significant impact on model
21 output, such as inflation, are treated in the model;
- 22 • whether and how the model reflects home-hardening or wildfire mitigation efforts; and
- 23 • how the model conforms to all applicable Actuarial Standards of Practice (ASOPs);

24 Testing

- 25 • provision of an unrestricted version of the model itself to enable independent testing of its
26 sensitivity to changes in input parameters, accuracy in predicting losses, and any other
27 elements deemed necessary to ensure the model's appropriateness for use in an insurance
28 ratemaking capacity;

- the results of a complete sensitivity analysis indicating the degree to which the model’s output changes as a result of small changes to each input variable independently;
- any effects on the model’s output of interactions between the input variables, and how any such interactions were corrected for;
- the model’s performance against actual historical California wildfire events; and
- how the model has been tested for and controls against providing biased results.

This is not meant to be an exhaustive list, and given the relative paucity of information about the Moody’s Model in the PRID Petition, Consumer Watchdog reserves all rights to conduct discovery and ask for further information and data regarding the Model based on what is produced during the course of the PRID procedure.

VII. AUTHORITY FOR PETITION TO PARTICIPATE

13. The authority for this petition is Insurance Code section 1861.10, subdivision (a), which grants “any person” the right to initiate or intervene in a proceeding permitted or established by Proposition 103 and the right to enforce Proposition 103. Specifically, as stated above, Consumer Watchdog seeks to participate in this PRID procedure to advocate for the necessary information and data regarding the Moody’s Model that must be submitted with any future rate application relying on the Model to ensure that homeowners policyholders are charged rates and premiums that comply with Insurance Code sections 1861.05(a), and Cal. Code Regs., Title 10, Chapter 5, subchapter 4.8 (10 CCR §§ 2641.1–2648.5) and that all information submitted to the Commissioner is publicly available as required by and 1861.07.

14. This petition is also authorized by 10 CCR §§ 2648.5(h), 2661.2, and 2661.4.

15. This petition is timely pursuant to 10CCR § 2648.5, subdivision (i), because it is filed within five (5) business days of the January 23, 2025 date the Model Advisor’s letter granting Moody’s Petition was posted publicly on the CDI’s website. The CDI’s website states that “Petitions for participation in the PRID procedure must be submitted to the Model Advisor (CDImodeladvisor@insurance.ca.gov) by January 30th, 2025.”⁵

⁵ See fn. 1, *ante*.

1 **VIII. PARTICIPATION OF CONSUMER WATCHDOG**

2 16. Consumer Watchdog verifies, in accordance with 10 CCR § 2661.3(b), that it will be able
3 to participate in this PRID procedure without delaying this proceeding or any other proceedings before
4 the Insurance Commissioner.

5 **IX. INTENT TO SEEK COMPENSATION**

6 17. Consumer Watchdog intends to seek compensation in this proceeding. Pursuant to 10
7 CCR § 2661.3(c), Consumer Watchdog’s estimated budget is attached as Exhibit A. Consumer
8 Watchdog based its estimated budget on several factors, including: (1) the technical and legal expertise
9 needed to address the legal, actuarial, and policy issues raised by the PRID procedure; (2) its current
10 best estimate of the time needed to participate effectively in this proceeding; and (3) past experience in
11 proceedings before the CDI. The attorney, paralegal, staff actuary, and expert witness hourly rates
12 contained in the attached budget do not exceed market rates as defined by 10 CCR § 2661.1(c).⁶ The
13 estimated budget is reasonable, and the staffing level and division of labor is appropriate, given the
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16 ⁶ 10 CCR § 2661.1(c) defines “market rates” as “the prevailing rate for comparable services in the
17 private sector in the Los Angeles and San Francisco Bay Areas *at the time of the Commissioner’s*
18 *decision awarding compensation* for attorney advocates, non-attorney advocates, or experts with similar
19 experience, skill and ability.” (Emphasis added.) The most recent seven Decisions Awarding
20 Compensation by Commissioner Lara to Consumer Watchdog in 2024 in rate proceedings found that the
21 *same* 2025 rates used in the estimated budget set forth in Exhibit A for its attorneys, staff actuary, and
22 paralegal, Mr. Rosenfield, Mr. Mellino, Mr. Armstrong, and Ms. Gentile, were reasonable and did not
23 exceed market rates in the private market in Los Angeles and the San Francisco Bay Area. (Decision
24 Awarding Compensation, Dec. 6, 2024, *In the Matter of the Rate Applications of Garrison Property and*
25 *Casualty Insurance Company and USAA Casualty Insurance Company*, File No. PA-2021-00004, pp. 8–
26 9; Decision Awarding Compensation, Dec. 6, 2024, *In the Matter of the Rate Application of State Farm*
27 *General Insurance Company*, File No. PA-2023-00006, pp. 8–9; Decision Awarding Compensation,
28 Dec. 6, 2024, *In the Matter of the Rate, Rule, and Form Application of Pacific Specialty Insurance*
Company, File No. PA-2020-00009, pp. 9–10; Decision Awarding Compensation, Dec. 6, 2024, *In the*
Matter of the Rate Application of State Farm General Insurance Company, File No. PA-2023-00007,
pp. 8–9; Decision Awarding Compensation, Dec. 6, 2024, *In the Matter of the Rate Application of*
Allstate Northbrook Indemnity Company, File No. PA-2023-00014, pp. 8–9; Decision Awarding
Compensation, Dec. 6, 2024, *In the Matter of the Rate Application of State Farm Mutual Automobile*
Insurance Company, File No. PA-2023-00012, pp. 8–9; Decision Awarding Compensation, Oct. 18,
2024, *In the Matter of the Rate Applications of Farmers Insurance Exchange, Mid-Century Insurance*
Company, and Truck Insurance Exchange, File No. PA-2023-00022, pp. 14–15.)

1 expertise that Consumer Watchdog brings to this proceeding when the issues involved are issues at the
2 very core of its organizational mission and strike at the very heart of Proposition 103 itself.

3 18. The budget presented in the attached Exhibit A is a preliminary estimate, and Consumer
4 Watchdog reserves the right to amend its proposed budget as its expenses become more certain, or in its
5 final request for compensation. Consumer Watchdog affirms that it will file an amended budget as soon
6 as possible when it learns that its total estimated budget amount increases by \$10,000 or more, in
7 accordance with 10 CCR § 2661.3(d).

8 WHEREFORE, Consumer Watchdog respectfully requests that the Insurance Commissioner
9 GRANT its petition to participate.

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11 DATED: January 30, 2025

Respectfully submitted,

12 Harvey Rosenfield
13 William Pletcher
14 Ryan Mellino
15 CONSUMER WATCHDOG

16 By: William Pletcher
17 William Pletcher
18 Attorneys for CONSUMER WATCHDOG
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1 **VERIFICATION OF WILLIAM PLETCHER IN SUPPORT OF CONSUMER WATCHDOG'S**
2 **PETITION TO PARTICIPATE AND NOTICE OF INTENT TO SEEK COMPENSATION**

3 I, William Pletcher, verify:

4 1. I am Director of Litigation for Consumer Watchdog. If called as a witness, I could and
5 would testify competently to the facts stated in this verification.

6 2. I personally oversaw the preparation of the pleading titled, "Consumer Watchdog's
7 Petition to Participate and Notice of Intent to Seek Compensation" filed in this matter. All of the factual
8 matters alleged therein are true of my own personal knowledge, or I believe them to be true after
9 conducting some inquiry and investigation.

10 3. Pursuant to California Code of Regulations, title 10, section 2661.3, subdivision (c),
11 Consumer Watchdog attaches as Exhibit A its estimated budget in this proceeding. I affirm that the
12 hourly rates in the estimated budget do not exceed market rates.

13 I declare under penalty of perjury under the laws of the State of California that the foregoing is
14 true and correct.

15 Executed on January 30, 2025 at Los Angeles, California.


16 
17 William Pletcher
18 William Pletcher

EXHIBIT A
PRELIMINARY ESTIMATED BUDGET
MOODY’S PRID PROCEDURE

<u>ITEMS</u>	<u>ESTIMATED COST</u>
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1. Consumer Watchdog Attorneys/Actuary/Paralegal

William Pletcher (Director of Litigation) @ \$550 per hour, 50 hours\$27,500

- Review draft and edit petition to participate; supervise Consumer Watchdog counsel; oversee preparation of discovery requests and any motions and/or briefing; confer with Consumer Watchdog counsel and outside experts regarding legal and factual issues; participate in discussions with CDI and Moody’s participants; assist in all phases of PRID procedure, including reviewing and editing proposed protective orders, review of discovery documents, cross-examination, and preparation of any post-procedure briefing; review and edit draft request for compensation, declaration in support.

Harvey Rosenfield (Of Counsel) @ \$695 per hour, 25 hours\$17,375

- Participate in discussions on Consumer Watchdog’s positions, particularly as they relate to compliance with Prop 103; review Consumer Watchdog’s submissions and Moody’s productions as needed.

Ryan Mellino (Staff Attorney) @ \$250 per hour, 100 hours.....\$25,000

- Edit petition to participate; confer with Consumer Watchdog counsel and outside experts regarding legal and evidentiary issues; participate in discussions with CDI and Moody’s participants; draft briefing on legal issues; conduct discovery, preparation of motions, proposed protective orders, and preparation for presenting oral testimony and conducting cross-examination; participate in examination of witnesses and all phases of PRID procedure and any post-procedure briefing; review and edit draft request for compensation, declaration in support.

Ben Armstrong (Staff Actuary) @ \$425 per hour, 100 hours\$42,500

- Consult with Consumer Watchdog attorneys to prepare discovery requests, review all discovery documents; prepare actuarial analysis and/or testimony on financial components of the model; participate in meet and confers with the parties as needed; testify and assist attorneys in preparation for cross-examination of Moody’s expert witnesses.

Kaitlyn Gentile (Paralegal) @ \$200 per hour, 25 hours\$5,000

- Draft and edit petition to participate, edit draft comments, proposed amendments to regulation text; draft request for compensation.

<u>Consumer Watchdog Subtotal</u>	<u>\$117,375</u>
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2. Expert Witness: Wildfire Risk Model Expert

TBD @ \$500 per hour, 100 hours\$50,000

- Consult with Consumer Watchdog advocates on the scientific questions and issues regarding the Moody's model; assist with preparation of discovery requests; review discovery documents; prepare testimony and assist with cross-examination of Moody's participants as needed on scientific components of the model.

Expert Witness Subtotal \$50,000

TOTAL ESTIMATED BUDGET: \$167,375

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PROOF OF SERVICE
BY OVERNIGHT OR U.S. MAIL, FAX TRANSMISSION,
EMAIL TRANSMISSION AND/OR PERSONAL SERVICE

State of California, City of Los Angeles, County of Los Angeles

I am employed in the City and County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 6330 South San Vicente Boulevard, Suite 250, Los Angeles, California 90048, and I am employed in the city and county where this service is occurring.

On January 30, 2025, I caused service of true and correct copies of the document entitled

CONSUMER WATCHDOG'S PETITION TO PARTICIPATE
AND NOTICE OF INTENT TO SEEK COMPENSATION

upon the persons named in the attached service list, in the following manner:

1. If marked FAX SERVICE, by facsimile transmission this date to the FAX number stated to the person(s) named.
2. If marked EMAIL, by electronic mail transmission this date to the email address stated.
3. If marked U.S. MAIL or OVERNIGHT or HAND DELIVERED, by placing this date for collection for regular or overnight mailing true copies of the within document in sealed envelopes, addressed to each of the persons so listed. I am readily familiar with the regular practice of collection and processing of correspondence for mailing of U.S. Mail and for sending of Overnight mail. If mailed by U.S. Mail, these envelopes would be deposited this day in the ordinary course of business with the U.S. Postal Service. If mailed Overnight, these envelopes would be deposited this day in a box or other facility regularly maintained by the express service carrier, or delivered this day to an authorized courier or driver authorized by the express service carrier to receive documents, in the ordinary course of business, fully prepaid.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 30, 2025 at Los Angeles, California.


Kaitlyn Gentile

Service List

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Kara Voss, Ph.D.
Model Advisor
Climate & Sustainability Branch
California Department of Insurance
300 Capital Mall, 16th Floor
Sacramento, CA 95814
CDImodeladvisor@insurance.ca.gov

- FAX
- U.S. MAIL
- OVERNIGHT MAIL
- HAND DELIVERED
- EMAIL

Margaret Hosel
Public Advisor
Tina Warren
Office of the Public Advisor
California Department of Insurance
300 Capitol Mall, 17th Floor
Sacramento, CA 95814
Tel. (916) 492-3705
Fax (510) 238-7830
Margaret.Hosel@insurance.ca.gov
Tina.Warren@insurance.ca.gov

- FAX
- U.S. MAIL
- OVERNIGHT MAIL
- HAND DELIVERED
- EMAIL



Via email

March 12, 2025

Kara Voss, PhD
Model Advisor
Climate & Sustainability Branch
California Department of Insurance
Email: CDImodeladvisor@insurance.ca.gov

**Re: Wildfire Risk Model Expert in the Matter of the PRID Procedure of Moody's
File No. PRID-2025-00002**

Dear Dr. Voss:

I write to inform you that Eytayo Opabola, PhD will act as the Wildfire Risk Model Expert that was included in Consumer Watchdog's Petition to Participate in the PRID Procedure of Moody's.

Dr. Opabola is an Assistant Professor in the Department of Civil and Environmental Engineering at the University of California, Berkeley. His email address is tayo@berkeley.edu.

Sincerely,

A handwritten signature in black ink that reads "Pamela Pressley".

Pamela Pressley
Senior Staff Attorney