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BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF CALIFORNIA

In the Matter of the PRID Procedure of:

AIR Worldwide Corporation d/b/a Verisk
Extreme Event Solutions.

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 AIR Worldwide Corporation doing business as
3 Verisk Extreme Event Solutions (“Verisk”). This PRID procedure, noticed by the Model Advisor on
4 January 22, 2025, is currently before the California Department of Insurance (“CDI”). This petition is
5 based on the facts as set forth below and the accompanying verification of Pamela Pressley.

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. VERISK PETITION TO INITIATE PRID PROCEDURE**

11 1. On January 2, 2025, Verisk submitted a Petition to Initiate a PRID Procedure for the
12 Verisk Wildfire Model for the United States (the “Model”) and to establish its right to participate in the
13 PRID procedure. In its Petition, Verisk asserts that the Model “incorporates leading knowledge of the
14 wildfire hazard and vulnerability as well as recent trends in variables that affect wildfire risk in the
15 Western United States.” Verisk further claims that under the Commissioner’s new wildfire catastrophe
16 modeling regulation, “the Model will allow insurers the ability to better assess risk, allowing them to
17 more accurately price insurance for homeowners and businesses who live and operate in wildfire-prone
18 areas.” Verisk verified that “there is no valid PRID for the Model, and the Model has not been subject to
19 public review in a California forum within the last four years.”

20 2. The Model Advisor apparently granted Verisk’s Petition in a letter dated January 16,
21 2025, and subsequently posted this letter granting the requested PRID procedure on the CDI’s website
22 on January 22, 2025.¹

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

25 3. There was no meaningful public notice or disclosure of Verisk’s Petition or the Model
26 Advisor’s January 16 letter. Consumer Watchdog only became aware of the Verisk PRID Petition by
27 conducting a search for “PRID” on the CDI’s website after seeing an industry news article stating that

28 _____
¹ See <https://www.insurance.ca.gov/01-consumers/180-climate-change/DetermineProcedure.cfm>.

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

11 **III. PETITIONER CONSUMER WATCHDOG**

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

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

20 6. Consumer Watchdog has served as a public watchdog with regard to insurance rates and
21 insurer rollback liabilities under Proposition 103 by: monitoring rollback settlements and the status of
22 the rollback regulations; reviewing and challenging rate filings made by insurers seeking excessive
23 rates; participating in rulemaking and adjudicatory hearings before the CDI; and educating the public
24

25 ² See <https://www.lifeinsuranceinternational.com/news/verisk-wildfire-catastrophe-model-california/?cf-view>.

26 ³ At a minimum, the Department should implement an email notification system allowing interested
27 parties to sign up for notifications of PRID submissions. Such a system is already in place for rate filings
28 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 concerning industry underwriting and rating practices, their rights under Proposition 103, and other
2 provisions of state law. Consumer Watchdog has also initiated and intervened in actions in state court
3 and appeared as amicus curiae in matters involving the interpretation and application of Proposition 103
4 and the Insurance Code.⁴

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

12 **IV. ELIGIBILITY TO SEEK COMPENSATION**

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

20 **V. INTEREST OF CONSUMER WATCHDOG IN PRID PROCEDURE**

21 9. Consumer Watchdog's overarching interest in the above-captioned proceeding is to
22 ensure that the models used by insurers in ratemaking are reliable and consistent with Prop 103's
23

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

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

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

22 11. Pursuant to Insurance Code section 1861.05, subdivision (b) and 10 CCR § 2648.4,
23 “every insurer that desires to change any rate must file a complete rate application which must include
24 the information required by Insurance Code section 1861.05, subdivision (b), and all information as the
25 Commissioner may require in order to perform a complete analysis of a rate application, including but
26 not limited to the exhibits, data, information, materials and documentation specified by Sections 2641.1
27 through 2643.8 and Sections 2644.1 through 2644.28” and “all of the materials described in subdivisions
28 (b) through (e) of [] Section 2648.4.” 10 CCR § 2648.4(c) delineates that a complete rate application

1 shall include “any and all criteria, guidelines, systems, manuals, models and algorithms, and any
2 proposed changes thereto, an insurer, agent, broker, or underwriter uses or relies upon to determine the
3 rate, rating rules and coverages for any particular applicant or insured, including optional coverage rates
4 and rules.” The purpose of this PRID procedure is to reach a determination “that specifies all
5 information and data regarding a model that are required to be provided to the Commissioner as part of a
6 complete rate application that relies upon the model for purposes of requesting a proposed rate change
7 pursuant to Insurance Code section 1861.05.” (10 CCR §§ 2648.5(a)(1), 2648.5(c).) “Required model
8 information,” according to the regulation, “means all required information and data regarding a model,
9 that the Commissioner requires to be submitted as part of a complete rate application that relies upon the
10 model, because such information and data will aid the Commissioner in determining whether the model
11 is reliable to perform the functions for which an insurer proposes to use the model, for purposes of the
12 Commissioner’s evaluation of a complete rate application.” (10 CCR 2648.5(a)(4).) Additionally,
13 “[r]equired model information shall include information that demonstrates the model uses established
14 concepts, data, equations, and principles, as well as best available scientific information and data,
15 insurance claims expertise, and other assumptions appropriate for the risk or peril being modeled.”
16 (10 CCR 2648.5(b).) Consumer Watchdog intends to participate fully in this PRID procedure to seek
17 and examine information and data regarding the financial and scientific components of the Verisk Model
18 and to provide the input of its experts to opine on what information and data should be required to be
19 submitted as part of a complete rate application that will ultimately aid the Commissioner and
20 intervenors in determining its reliability during the rate review process.

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

1 Data

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

12 Model Operation

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

22 Testing

- 23 • provision of an unrestricted version of the model itself to enable independent testing of its
- 24 sensitivity to changes in input parameters, accuracy in predicting losses, and any other
- 25 elements deemed necessary to ensure the model’s appropriateness for use in an insurance
- 26 ratemaking capacity;
- 27 • the results of a complete sensitivity analysis indicating the degree to which the model’s
- 28 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 Verisk 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 Verisk 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 22, 2025 date the Model Advisor’s letter granting Verisk’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 29th, 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, Ms. Pressley, Mr. Powell, Mr. Armstrong, and Ms. Gentile, were reasonable
23 and did not exceed market rates in the private market in Los Angeles and the San Francisco Bay Area.
24 (Decision Awarding Compensation, Dec. 6, 2024, *In the Matter of the Rate Applications of Garrison*
25 *Property and Casualty Insurance Company and USAA Casualty Insurance Company*, File No. PA-2021-
26 00004, pp. 8–9; Decision Awarding Compensation, Dec. 6, 2024, *In the Matter of the Rate Application*
27 *of State Farm General Insurance Company*, File No. PA-2023-00006, pp. 8–9; Decision Awarding
28 Compensation, 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.

10
11 DATED: January 28, 2025

Respectfully submitted,

12 Harvey Rosenfield
13 Pamela Pressley
14 Benjamin Powell
15 CONSUMER WATCHDOG

16 By:



17 Pamela Pressley
18 Attorneys for CONSUMER WATCHDOG
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1 **VERIFICATION OF PAMELA PRESSLEY IN SUPPORT OF CONSUMER WATCHDOG'S**
2 **PETITION TO PARTICIPATE AND NOTICE OF INTENT TO SEEK COMPENSATION**

3 I, Pamela Pressley, verify:

4 1. I am a Senior Staff Attorney employed by Consumer Watchdog. If called as a witness, I
5 could and 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 28, 2025 at Los Angeles, California.

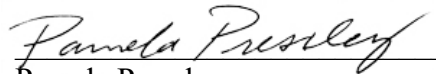
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18 Pamela Pressley

EXHIBIT A
PRELIMINARY ESTIMATED BUDGET
VERISK PRID PROCEDURE

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

Pamela Pressley (Senior Staff Attorney) @ \$595 per hour, 50 hours\$29,750

- 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 Verisk 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 Verisk’s productions as needed.

Benjamin Powell (Staff Attorney) @ \$350 per hour, 100 hours\$35,000

- Edit petition to participate; confer with Consumer Watchdog counsel and outside experts regarding legal and evidentiary issues; participate in discussions with CDI and Verisk’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 Verisk’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.

Consumer Watchdog Subtotal **\$129,625**

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 Verisk model; assist with preparation of discovery requests; review discovery documents; prepare testimony and assist with cross-examination of Verisk participants as needed on scientific components of the model.

Expert Witness Subtotal \$50,000

TOTAL ESTIMATED BUDGET: \$179,625

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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 28, 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 28, 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 AIR
Worldwide Corporation d/b/a Verisk Extreme Event Solutions
File No. PRID-2025-00001**

Dear Dr. Voss:

I write to inform you that Eyitayo 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 AIR Worldwide Corporation d/b/a Verisk Extreme Event Solutions.

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