



Kara Voss, Ph.D.

Model Advisor

California
Department of Insurance

Climate & Sustainability Branch
California Department of
Insurance

CDIModelAdvisor@insurance.ca.gov

November 21, 2025

Re: Cotality Petition for Initiation and Participation in PRID for Cotality U.S. Wildfire Model v.25.1

Dear Model Advisor Voss,

CoreLogic Solutions, LLC, a subsidiary of CoreLogic, Inc. d/b/a Cotality ("Cotality") hereby petitions the California Department of Insurance to initiate a Pre-Application Required Information Determination ("PRID") procedure for the Cotality U.S. Wildfire Model v25.1 ("Cotality U.S. Wildfire Model") and respectfully requests approval to participate in the PRID procedure.

Cotality is a leading global provider of hazard and risk models, insights, and solutions with headquarters in Irvine, California and additional offices across North America, Europe, and Asia.

Cotality is at the forefront of providing innovative solutions to help clients address complex challenges associated with natural disaster risk. Cotality's catastrophe solutions, which includes the Cotality U.S. Wildfire Model are trusted by the top five global reinsurance and reinsurance brokerages as well as over 150 P&C insurance company clients (including global and consulting services projects). Today, Cotality continues its commitment to delivering reliable, data-driven insights that help stakeholders mitigate risk and enhance resilience in an evolving global environment.

The Cotality U.S. Wildfire Model features robust hazard definitions, comprehensive agents of damage, localized vulnerability functions, and detailed financial modeling. The Cotality U.S. Wildfire Model accounts for both burn and smoke damage and incorporates over 3.5 million stochastic events generated using high-resolution terrain and environmental data (30m x 30m). By leveraging the Cotality U.S. Wildfire Model, insurers, reinsurers, government agencies, utility companies, and communities can quantify their wildfire risk and identify strategies for insurance policy holders to mitigate their wildfire risk.

Insurers and reinsurers leverage the U.S. Wildfire Model in several states to evaluate wildfire exposure. In California, Cotality's approved wildfire score models have been in use for years, offering significant benefits such as improved underwriting precision and alignment with regulatory standards.

By submitting this letter, Cotality confirms that the Cotality U.S. Wildfire Model measures up to the applicable regulatory standards, which require that a model incorporate best available scientific information on risk mitigation at the property, community, and landscape scales, and use established concepts, data, equations, and principles, as well as best available scientific information and data, insurance claims expertise, and other assumptions appropriate for the risk or peril being modeled.

The Commissioner will benefit from a PRID in connection with the Cotality U.S. Wildfire Model as Cotality confirms that there is currently no valid PRID for the Cotality U.S. Wildfire Model and that the Cotality U.S. Wildfire Model has not previously been subject to public review in a California forum, including as part of a complete rate application, within the last four years, as required by Section 2648.5(h)(3).



www.cotality.com

Cotality provides the following names, titles, and contact information for each individual who will be participating in the procedure:

- Jamie Knippen, Senior Product Manager- jknippen@cotality.com
- Howard Kunst – Sr Principal, Actuarial Science-hkunst@cotality.com
- David Smith – Sr Director, Hazard Science – dfsmith@cotality.com
- Annes Haseemkunju – Director, Science & Analytics – ahaseemkunju@cotality.com
- Ilyes Meftah – Principal, Hazard Scientist – imeftah@cotality.com
- Thomas Jeffery – Sr Wildfire Hazard Scientist – tjeffery@cotality.com
- Robert Kowalski – Wildfire Hazard Scientist – rkowalski@cotality.com
- Aaron Bagnell – Sr Hazard Scientist – abagnell@cotality.com
- Mikhail Palatnik – Senior Vice President, Product – mpalatnik@cotality.com
- Paul Gaspar – VP, Science & Analytics – pgaspar@cotality.com
- Tim Taylor – Senior Director, Product Management – ttaylor@cotality.com
- Jonathan Sam – Senior Hazard Scientist – jonsam@cotality.com
- Matthew Rabe – VP, Associate General Counsel – mrabe@cotality.com
- Daniel Deneufbourg – Sr Principal, Associate General Counsel – ddeneufbourg@cotality.com
- Michael D. Adams, Outside Counsel – madams@rutan.com
- Damon Mircheff, Outside Counsel – dmircheff@rutan.com
- Seth Jessee, Outside Counsel – sjessee@rutan.com

The following individuals from Cotality will serve as the designated contacts for email communications in this procedure and will forward communications to the above-listed individuals from our organization who will be involved in the procedure:

1. Jamie Knippen, Senior Product Manager - jknippen@cotality.com
2. Howard Kunst – Sr Principal, Actuarial Science Officer – hkunst@cotality.com
3. David Smith – Sr Director, Hazard Science – dfsmith@cotality.com

Cotality confirms its ability to attend and actively participate in the PRID procedure without causing unreasonable delay.

Respectfully submitted,

CoreLogic Solutions, LLC

Signed by:

Mikhail Palatnik

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Mikhail Palatnik

Senior Vice President, Product, Insurance mpalatnik@cotality.com

Cc:

Jamie Knippen

Senior Product Manager, Wildfire Underwriting and Risk Management Solutions jknippen@cotality.com