



Senator Susan Rubio, Chair
Senate Insurance Committee
1020 N St., Room 258
Sacramento, CA 95814

April 23, 2025

Re: SB 429 – Public Wildfire Catastrophe Model

Dear Chair Rubio,

On behalf of Public Citizen and the 6 undersigned organizations, we write in support of SB 429 (Cortese), which would direct California universities to develop a publicly accessible wildfire catastrophe model.

As wildfire risk intensifies across California, insurers and reinsurers are increasingly relying on opaque catastrophe models to predict growing climate threats and estimate potential financial losses. These proprietary tools operate with limited transparency regarding data inputs and assumptions, leaving regulators, policymakers, and the public in the dark about the factors driving insurers' rate hikes and underwriting decisions.

Without transparency, inconsistencies, [errors](#), or embedded biases that exacerbate racial [disparities](#) could go unchallenged. Communities that have historically been subject to discriminatory practices may find themselves [‘bluelined’](#) from areas deemed to be at high environmental risk with little warning. Communities across California may face rate hikes or coverage losses without any meaningful way to understand or challenge rate increase or coverage denials.

A public model can help prevent these inequities by offering consistent, open source methodologies and data sources that all stakeholders can scrutinize. This would promote fairness in insurance pricing and ensure that vulnerable communities are not penalized by opaque or biased modeling practices. Given the limitations of catastrophe models, transparency is essential. By grounding these models in publicly available data and subjecting them to public scrutiny, policymakers can better protect consumers and promote equitable outcomes in the insurance industry.

The high cost of proprietary catastrophe models also currently shuts out the public and local governments, even though these private models [rely](#) on publicly funded data. This creates a troubling information gap, where private companies profit from public resources while

communities and regulators are left in the dark. Increasing public modeling capacity is essential to ensure that decision-making serves the public interest, not just private profit. Legislators should ensure that the insurance industry is not the only beneficiary of additional data and climate modeling capacity. A public model would allow for more rigorous evaluation of rate filings, improved emergency planning, smarter public investment in mitigation strategies, and provide greater regulatory oversight of proprietary models.

Public Citizen, along with a coalition of public interest, environmental justice, and consumer advocacy organizations, urges the creation of a publicly accessible wildfire catastrophe model to serve all Californians. We are encouraged by the advancement of SB 429 and strongly urge your support for this critical measure.

Thank you,

Public Citizen

Americans for Financial Reform

CarbonPlan

Consumer Federation of America

SoCal 350 Climate Action