

# 100 Days to A.C.T. on Insurance

*Affordability,*
*Climate Risk Reduction &*
*Transparency*

**A first-100-days agenda for California's Next Insurance Commissioner**

## 100 Days to A.C.T. on Insurance

The Blueprint to A.C.T. calls for Affordability, Climate Risk Reduction, and Transparency from the next California Insurance Commissioner. The experts in insurance, consumer protection, climate, financial risk, and community investment who crafted the Blueprint have developed the following outline for the incoming Insurance Commissioner's first 100 days in office that aligns with those goals.

These priorities reflect what the next Insurance Commissioner can immediately do to lower Californians' costs and improve their lives in light of the accelerating insurance crisis, while laying the groundwork for further progress over the remainder of their term.

**Lead Contributors:**
Americans for Financial Reform | Climate Cabinet Education | Consumer Watchdog | Dave Jones, California Insurance Commissioner Emeritus | Extreme Weather Survivors | The Greenlining Institute | Public Citizen | Rise Economy

# Day One Priority Actions

> ***These actions are all within the current powers of the Insurance Commissioner and require no legislative action or approvals.***

1. Rescind the rule allowing insurers to shift $500M in FAIR Plan assessment costs onto policyholders as one immediate way to prevent climate risk costs that should be absorbed by the insurers that make up the FAIR Plan from falling onto everyday Californians.

2. Rescind the regulations undermining the Proposition 103-established consumer intervenor program.

3. Issue a bulletin to help families still displaced by the Los Angeles fires:

   - Advise insurers that ongoing conditions create a presumption that additional living expenses (ALE) coverage must be extended an additional 12 months under Insurance Code § 2060(b).
   - Request that insurers raise ALE policy limits so families keep receiving ALE payments while their claims remain unresolved.
   - Require insurers to report within 5 days whether they will do so, and make each insurer's answer public.

4. Issue a bulletin recommending that insurers operating in the state create and submit to the CDI transition plans — company-wide plans covering underwriting, investment, and operations — consistent with California's commitment to net zero greenhouse gas emissions by 2045 (AB 1279, 2022). Require insurers to report to CDI whether they will or will not comply, and publicly release which companies agree or decline to participate.

5. Grant wildfire survivors formal participant status in the current market conduct examination of State Farm's handling of Eaton and Palisades fire claims by the California Department of Insurance (CDI) — which has documented hundreds of claim-handling violations.

6. Begin the Affordable Housing Insurance Coverage Study required by AB 1339 (2025), which directs the CDI to study insurance availability and costs for affordable multifamily housing.

7. Make the California ZIP code-level results of the property and casualty insurance market data call by the National Association of Insurance Commissioners (NAIC) — which collects policy counts, premiums, and losses — publicly available in a searchable, downloadable form.

8. Require public access to, and an opportunity to review, all catastrophe models insurers submit to the CDI. Under the current Pre-Application Required Information Determination (PRID) process, insurers can resolve rate-application questions with the CDI behind closed doors before the public record opens — the public is entitled to be able to review the models themselves.

9. Require that the public wildfire catastrophe model the state is developing under SB 429 (2025) — the California Wildfire Public Catastrophe Model Act — integrate climate attribution science so the model shows how different emissions pathways affect risk and loss distributions, tail risks, and uncertainties over the rest of the century.

10. Announce the CDI's expectation that the FAIR Plan's implementation of the clearinghouse established by AB 1680 (2025) will not unduly lead to further surplus line growth in California.

# 100 Day Priority Actions

*These actions are all within the current powers of the Insurance Commissioner and require no legislative action or approvals.*

1. Issue an annual data call requiring companies to report their fossil fuel investments and underwriting, publish the results by company, and adopt a regulation requiring this information to be publicly reported annually so that this practice is binding on future insurance commissioners.

2. Issue a quarterly data call — a formal regulator's demand for information from licensed insurers — requiring insurers to report on cancellations and non-renewals by ZIP code and make this information public.

3. Issue a regulation requiring every model and method used to determine rate relativities to account for risk mitigation at the property level (home hardening), the community level (public infrastructure), and the landscape level (fuel reduction).

4. Open market conduct examinations on additional insurers regarding alleged discriminatory claims handling during the Eaton and Palisades fires, including conduct affecting disproportionately impacted communities, and grant survivors participant status in the proceedings.

5. Release findings from the CDI's announced investigation into surplus line growth in California, including but not limited to violations of state law regarding wildfire deductibles, and any concerns about affordability and insurer solvency that may result from surplus line growth.

6. Uphold and strengthen the insurer planning and disclosure requirements in the Long-Term Solvency Planning Regulation adopted in October 2026, which requires insurers domiciled in CA to document how they will manage long-term climate, cyber, and economic risks:

   - Require that long-term strategy targets extend to all insurer activities: underwriting, investments, and operations, and include science-based emissions reduction targets.
   - Require long-term physical risk management strategies that are grounded in building resilience rather than market retreat.
   - Make the insurers' submitted plans and data public.
   - Officially request that all insurers licensed in California voluntarily comply with the regulation, and publicly release which companies agree or decline to participate.

7. Using the Commissioner's authority over the plan of operations of the FAIR Plan:

   - Add sufficient public (non-insurer) members to the FAIR Plan's board to give them a voting majority.
   - Require the FAIR Plan to make its agendas, minutes, claims data, policy counts by geographic area, and financial records public.
   - Require the FAIR Plan to participate in the NAIC Climate Risk Disclosure Survey, the annual standardized climate-risk questionnaire all other major insurers already file.
   - Require the FAIR Plan to dedicate a portion of the investment earnings on its surplus to fund a home hardening and community-level fuel reduction grant program for its policyholders, scaled to the modeled reinsurance and claims savings from mitigation and reviewed by the CDI — similar to the North Carolina Insurance Underwriting Association's fortification grant program.

# New Legislation to Pursue

*The Insurance Commissioner and CDI can officially co-sponsor bills, lending authority, expertise, and dedicated cooperation to legislative efforts.*

1. Require fossil fuel companies to pay a fair share of climate-driven increases in insurance and utility costs, recognizing their role in and contribution to extreme weather losses and lessening the burden on everyday people.
2. Require full implementation and enforcement of the 2023 fossil fuel price gouging law (SB X1-2), which created the Division of Petroleum Market Oversight and a penalty on oil refiners' windfall profits, and expand the allowable use of recovered profits to include funding of community resilience projects.
3. Require that underwriting models fully reflect risk mitigation at the property-, community-, and landscape-level. This legislation would be a companion to the regulatory action above (item 3 of the 100 Day Priority Actions), which requires the same risk mitigation to be reflected in rate relativity models.
4. Require insurers to offer and renew coverage on homes that meet statutory or CDI-established resilience standards — as was proposed in the Insurance Coverage for Fire-Safe Homes Act (SB 1076, 2026), which did not pass out of committee.
5. Strengthen the California Organized Investment Network (COIN) — the CDI program that steers insurer investments toward underserved communities — to better connect insurer capital with climate risk reduction that benefits low- and moderate-income communities. Improvements should include enhanced program transparency, internal investment targets for insurers, restoration of the lapsed COIN tax credit, and other incentives and potential requirements for participation.

# Other Advocacy

*The Insurance Commissioner can use their position to influence the Governor, other state agencies, and the industry to take actions that will advance consumer-friendly and future-smart policies.*

1. Advocate for additional budget from the Governor and Department of Finance to expand the CDI's review and enforcement capacity, consumer services, and cross-agency collaboration.
2. Advocate that growth in existing property and casualty insurance premium tax revenue be earmarked for climate risk mitigation projects.
3. Encourage product innovation from the industry that incentivizes policyholders to take an active role in mitigation, such as multi-year policies with meaningful customer discounts for verified mitigation.