



January 8, 2026

Commissioner Michael Conway
Colorado Dept of Insurance
1580 Broadway Ste 110
Denver, CO

Re: Proposed new regulation 5-1-xx concerning homeowners insurance filing requirements for wildfire models and mitigation discounts

Proposed new regulation 5-1-28 concerning insurer and FAIR Plan notification of available premium reduction options related to property-specific and community-level mitigation actions taken to reduce wildfire risk

Dear Commissioner and Staff,

United Policyholders appreciates the opportunity to comment on the above-referenced regulatory proposals. We generally support both proposals and offer a limited number of suggested enhancements.

It is important that homeowners' insurance rates in Colorado that are based on risk scores and/or wildfire models not be excessive due to failing to reflect completed parcel and/or community level risk reduction measures. It is important that consumers be informed as to what factors impact their risk score and which specific mitigation measures will earn them an improved risk score, reduced premium and/or discount. Not only do we need to ensure that rates are fair and not excessive, we need to educate consumers, incentivize and reward them for spending time and money on home improvements that reduce risk, but we also need to mandate disclosures that will lead to insurers competing to offer more generous discounts to attract customers.



1) Proposed new regulation 5-1-xx concerning homeowners insurance filing requirements for wildfire models and mitigation discounts

We support this regulation as drafted, as it will give the Colorado Division of Insurance the information it needs to ascertain whether or not the wildfire models that are submitted in support of rate filings are adjusted to reflect completed parcel and community level mitigation actions, and/or whether rate filings that tie rates to individual risk scores are appropriately reflecting those actions.

2) Proposed new regulation 5-1-28 concerning insurer and FAIR Plan notification of available premium reduction options related to property-specific and community-level mitigation actions taken to reduce wildfire risk.

In the current P&C residential underwriting environment, a consumer's claim history, risk profiles and risk score are now determinative as to the options and pricing that will be offered to them at renewal or when they apply for a new policy. Customer loyalty/persistency and timely premium payments appear to now have relatively little value. Yet, with very few exceptions, consumers have little to no understanding of what their risk profile or risk score is, what those things are based on, or what they can do to improve either one. We need to fix that, and this proposed regulation will move us in that direction.

The proposed regulation appropriately requires insurers and the FAIR Plan to offer discounts for defined mitigation features that may already be in place or that can be implemented by individual policyholders and provide consumers with detailed information about the availability of these discounts not just on their websites but directly, in writing, upon renewal or upon application, to insureds and applicants for coverage. It also appropriately requires insurers to provide an appeal process for consumers to challenge their risk score.

We suggest strengthening the draft as follows (highlighted italics)

Section 5 A. Rules

If an insurer or the FAIR Plan does not incorporate property-specific or community-level mitigation actions in their wildfire risk models or catastrophe models, they shall provide discounts for policyholders who demonstrate that property-specific or community-level mitigation actions have been undertaken.

B. An insurer or the FAIR Plan shall post on its public website, in an easily accessible location, the following information:

1. Property-specific mitigation actions the policyholder may undertake that ~~may~~ will result in a discount, incentive or other premium adjustment. The amount of discount, type of incentive or other premium adjustment must be clearly identified.

2. Community-level mitigation actions that may be undertaken ~~and that may~~ that will result in a discount, incentive or other premium adjustment. The amount of discount, type of incentive or other premium adjustment available must be clearly identified. The process for appealing a wildfire risk score.

D. An insurer or the FAIR Plan shall post on its public website, in an easily accessible location, the following information: Property-specific mitigation actions the policyholder may undertake that ~~may~~ will result in a discount, incentive or other premium adjustment. The amount of discount, type of incentive or other premium adjustment must be clearly identified. Community-level mitigation actions that may be undertaken and that ~~may~~ will result in a discount, incentive or other premium adjustment. The amount of discount, type of incentive or other premium adjustment available must be clearly identified. The process for appealing a wildfire risk score, *what factors the score is based on, what actions they can take to improve their score and where their score falls in the range of possible scores.* If an insurer or the FAIR Plan does not provide discounts, they shall post on their public website that discounts for property-specific or community-level mitigation actions are not available. An insurer or FAIR Plan that provides a mitigation discount or that utilizes a wildfire risk model, risk score, or any other wildfire risk classification shall provide a policyholder or applicant a plain language explanation of the wildfire model, classification, discount or score, which includes an explanation that insurers may use different models and have different risk score ranges, identifies the applicable wildfire risk score or assigned classification for the property and provides mitigation actions that, if undertaken individually or in combination, ~~may~~ will impact the policyholder's or applicant's premium, wildfire risk score or assigned classification. The plain-language explanation of the wildfire model, classification, discount or score must be sent with new policies effective, and renewal policy offers sent to the policyholder, on or after July 1, 2026.

Our suggested alternative language will provide applicants and policyholders with the key and actionable information they need to shop in a marketplace where it is challenging to find available and affordable coverage. And it will bring transparency and consumer awareness to risk scores that have become “make or break” for getting or keeping coverage.

Respectfully submitted,



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