United Policyholders

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August 17, 2026

Colorado Division of Insurance
Department of Regulatory Agencies
1560 Broadway, Suite 110
Denver, Colorado 80202

Re: Proposed Emergency Regulation 26-E-04 - Aspen Acres Fire

Dear Commissioner and Division Staff:

United Policyholders ("UP") strongly supports the adoption of Proposed Emergency Regulation 26-E-04. This regulation establishes a moratorium on certain cancellations and nonrenewals in areas affected by the Aspen Acres Fire.

When a catastrophic wildfire threatens a region, underwriting decisions regarding the availability and renewal of property insurance will inevitably be influenced by the imminent threat of loss. Without appropriate protections, homeowners who have maintained and paid for insurance for years could lose their coverage at precisely the moment they need it most.

A moratorium is a straightforward and objective means of addressing this problem. It preserves coverage by freezing underwriting decisions made before the wildfire created an extraordinary and immediate risk. Without the protection afforded by the regulations, individual homeowners and impacted communities will struggle to recover from the impacts of this wildfire for many years.

UP agrees with the Division that immediate action is necessary to protect Colorado homeowners from severe financial hardship and strongly urges adoption of Emergency Regulation 26-E-04 without delay.

UP also encourages the Division to maintain appropriate protections during the recovery and rebuilding period. For homeowners whose properties are damaged or destroyed, recovery can take years, and continuity of insurance coverage is critical to successful rebuilding and community recovery.

Thank you for the opportunity to comment.

Sincerely,

Richard Oatis

On behalf of United Policyholders