STATE OF CALIFORNIA
DEPARTMENT OF INSURANCE
300 Capitol Mall, 17th floor
Sacramento, CA 95814

NOTICE OF PROPOSED ACTION AND NOTICE OF PUBLIC HEARING

CATASTROPHE MODELING AND RATEMAKING

August 16, 2024 **REG-2023-00010**

Exempt Rulemaking

Pursuant to Government Code section 11340.9(g), this proceeding is exempt from the rulemaking provisions of the Administrative Procedure Act.

SUBJECT OF PROPOSED RULEMAKING

Notice is given that California Insurance Commissioner Ricardo Lara will hold a public hearing to consider amending California Code of Regulations, Title 10, Chapter 5, Subchapter 4.8, Article 4, sections 2644.4, 2644.5, 2644.8, and 2644.27, and adopting section 2644.4.5 and 2644.4.8, as well as adopting Article 8, section 2648.5.

PUBLIC HEARING

The Commissioner will hold a public hearing to provide all interested persons an opportunity to present statements or arguments, either orally or in writing, concerning these regulations, as follows:

Date: September 17, 2024

Time: 10:00 a.m. The public hearing shall continue until all in attendance wishing to provide comments have commented, or 1:00 pm.

Location: https://us06web.zoom.us/webinar/register/WN_AlZHZOIOS_6LI9G0-BQYUQ

The telephonic call-in line that is available to access the public hearing is accessible to persons with hearing impairment. Persons with sight or hearing impairments are requested to notify one of the contact persons for this hearing (listed below) in order to review available accommodations, if necessary.

PRESENTATION OF WRITTEN COMMENTS; CONTACT PERSONS

All persons are invited to submit written comments on the proposed regulations during the public comment period. The public comment period will end on **September 17, 2024.** Please direct all written comments to the following contact person:

Sara Ahn, Staff Counsel
California Department of Insurance
c/o Office of the Special Counsel
300 Capitol Mall, 16th Floor
Sacramento, CA 95814
Phone: (213) 346-6635
Email: CDIRegulations@insurance.ca.gov

The above contact person may be directly contacted with any questions regarding the substance of the proposed action at the following email address: CDIRegulations@insurance.ca.gov

The following contact person may also serve as a backup to the contact person listed above:

Margaret Hosel, Staff Counsel
c/o Office of the Special Counsel
300 Capitol Mall, 16th Floor
Sacramento, CA 95814
Phone: (415) 538-4383
Email: CDIRegulations@insurance.ca.gov

All other inquiries, including procedural questions related to submitting comments or participating in the hearing, should be addressed to the following contact person.

Abigail Gomez
California Department of Insurance
c/o Office of the Special Counsel
300 Capitol Mall, 16th Floor
Sacramento, CA 95814
Phone: (916) 492-3507
Email: CDIRegulations@insurance.ca.gov

Please note that under the California Public Records Act (Government Code Section 6250, et seq.), any written and oral comments, and associated contact information included in such comments (e.g., electronic or physical address, phone number, etc.) become part of the public record and can be released to the public upon request.

DEADLINE FOR WRITTEN COMMENTS

All written materials must be received by the Insurance Commissioner, addressed to the contact person at the address listed above, no later than **September 17, 2024.** Any written materials received after that time may not be considered.

COMMENTS TRANSMITTED BY E-MAIL

The Commissioner will accept written comments transmitted by e-mail provided they are sent to the following e-mail address: CDIRegulations@insurance.ca.gov.

Comments sent to e-mail addresses other than that which is designated in this notice will not be accepted. Comments sent by e-mail are subject to the deadline set forth above for written comments.

AUTHORITY AND REFERENCE

The proposed regulations will implement the provisions of Insurance Code sections 730, 1850.4, 1858.6, 1861.01, 1861.05, 1861.07, 1861.09, 1861.10, and 12924, which also provide the rulemaking authority for this action. The Commissioner is authorized to promulgate regulations to implement Proposition 103. *20th Century Ins. Co. v. Garamendi* (1994) 8 Cal.4th 216.

INFORMATIVE DIGEST

Summary of Existing Law

Proposition 103 is codified in Insurance Code sections 1861.01 et seq., and requires, *inter alia*, that no insurance rate subject to its terms shall be inadequate, excessive, or unfairly discriminatory. To help determine whether rates are excessive, inadequate, or unfairly discriminatory, Insurance Code section 1861.05 requires any insurer desiring to change its rates for property and casualty insurance to file a complete rate application with the Insurance Commissioner for his review and approval prior to using the proposed rates. Additionally, Proposition 103 encourages public participation in the ratemaking process and allows consumer representatives to intervene in the review of rate filings. A complete rate application contains certain data specified by statutes and regulations as well as such other information as the Commissioner may require. Under Insurance Code section 1861.07, all information *provided to the Commissioner* as part of a complete rate application must be available for public inspection and therefore, made public.

California is currently the only state that prohibits insurers from using models to base projected losses in most property and casualty lines of insurance. The only exception to this prohibition is for projected losses for earthquakes and fire following earthquakes. For all other risks, current regulations found in Title 10, sections 2644.4 and 2644.5 require insurers to base projected losses using historical experience, with catastrophe losses based on a long-term average of catastrophe claims of at least the past 20 years for homeowners coverage.

Effect of Proposed Action

The proposed amendments in this rulemaking will permit insurers to use forward-looking catastrophe models in their rate calculations and make necessary changes to the existing rate-making formula to ensure that the use of such catastrophe models in ratemaking will be actuarially sound. This rulemaking will also adopt and amend regulations to create a new procedure, the pre-application required information determination procedure (PRID procedure), to allow the public a fulsome opportunity to thoroughly investigate the inner workings of such models, irrespective of whether the information sought is actually relevant to rate-making, while at the same time respecting potentially trade-secret proprietary information of model vendors and owners. In addition, this rulemaking will provide that only insurers that commit to writing additional policies or maintaining policies in distressed areas may be permitted to use forward-looking catastrophe models in their commercial and residential property rate filings to calculate the wildfire component in their overall rates, because their historical experience may no longer accurately reflect their projected losses given the anticipated changes in their book of business as well as climate-related factors.

Given the importance of balancing consumers' rights to participate in a thorough investigation of the reliability of these forward-looking models for use in ratemaking with the third-party modelers' concerns regarding the protection of their proprietary information, the Department has built in necessary confidentiality protections as part of this rulemaking so that proprietary information about the model that is not relevant to rate-making is never made public. Ultimately, information and data relevant to ratemaking provided to the Commissioner as part of a complete rate application will be made public under Insurance Code section 1861.07 but other irrelevant information that the public would like to investigate during the PRID procedure would be kept confidential and not subject to Insurance Code section 1861.07.

Policy Statement Overview

While using historical experience may have allowed insurers to accurately project losses in prior eras, insurers and others working in the insurance field note that the progression of increased risk of loss due to wildfire, extreme weather events, and other climate risks, now renders historical experience increasingly unsuitable to accurately project losses. Additionally, historic losses may not be as accurate in predicting future losses where insurers agree to change their historic books of business by writing or maintaining additional policies in higher-risk wildfire-prone areas. Proponents of models cite advances in modeling technology in support of reliance on these tools to more accurately project losses in an era of increasing climate risk.

Based on input from public workshops together with a thorough assessment of today's insurance landscape, the Department believes that allowing companies to use catastrophe models in their rate calculations will give them the ability to more accurately anticipate future potential catastrophe losses, thereby supporting greater availability of insurance. The Department is mindful that the use of catastrophe models must fit within the existing rate approval process and informed by California's goals of fairness, availability, and affordability. Further, the Department has been very clear that ensuring public participation in the rate-setting process is of utmost importance as it strives to increase the availability of reliable insurance from the admitted market, ensure the long-term sustainability of rates, and incentivize the accurate recognition of mitigation efforts.

Benefits Anticipated

The proposed regulation allows insurers to use catastrophe models to project annual aggregate losses for wildfire exposure if the insurers meet certain conditions to demonstrate a need to use such models. Allowing insurers to use forward-looking models to estimate projected losses for rate-making purposes is expected to provide benefits including:

- Improving pricing accuracy and rate stability by allowing insurers to use additional tools to assess prospective exposure to catastrophe losses in their rate calculations.
- Promoting availability of insurance in areas that have been underserved by improving pricing accuracy and encouraging a more competitive market.
- Promoting fairness as models can more timely account for risk mitigation trends as a result of risk mitigation actions taken at community and property levels.
- Encouraging uniformity and consistency in insurance ratemaking by allowing the use of scientifically, computationally, and actuarially sound models to project catastrophe losses in property and casualty lines, a practice allowed in all other states.
- Standardizing the usage of non-modeled losses to streamline the rate review approval process, minimize disputes, and allow for the more focused review and faster approval of rate applications.

The new, optional PRID procedure is intended to expedite the Department's review and approval of rate filings that rely upon models by eliminating unnecessary pre-hearing discovery disputes regarding models that delay the process. Because a singular pre-application required information determination can be relied upon in multiple rate filings by various insurers, the proposed regulation will expedite the Department's review and approval of rate filings, which will directly impact insurance availability and promote a robust and competitive insurance marketplace. Benefits anticipated to result from the PRID procedure include:

- Increasing openness and transparency in business and government by establishing a procedure to allow for thorough investigation of a model to determine what information and data is pertinent to using that model in ratemaking.
- Clarifying and expediting the review of modeled catastrophe loss projections and overall rate review process by establishing the role of a Model Advisor to direct a new procedure specified by these regulations and make determinations as to what constitutes required model information in a rate application. Without this procedure, model disputes would likely occur during the rate application, potentially leading to lengthy delays in the rate review and approval process.

Further, allowing insurers that commit to writing additional policies or maintaining policies in distressed areas to use forward-looking catastrophe models is expected to increase availability of residential and commercial property insurance options for Californians, because this requirement:

- Promotes market efficiency by providing insurers that commit to writing more business in distressed areas, and/or taking out of the FAIR Plan more policies insuring properties impacted by heightened wildfire risk, a mechanism for calculating rates more accurately than may be possible using historical loss trends, thus enabling insurers to charge rates commensurate with the associated increased risk of loss.
- Promotes fairness by creating an attainable standard that all companies must follow should they want to use catastrophe modeling in ratemaking.
- Increases competition in the voluntary insurance market for qualified residential insurance policies in distressed areas, as an insurance company will now need to write additional policies to meet, or maintain, its insurer commitment.
- Encourages FAIR Plan depopulation by incentivizing voluntary market insurers to write policies in distressed areas. FAIR Plan depopulation would alleviate insurer uncertainty due to high levels of risk in the FAIR Plan. In the event of a large wildfire, insurers could be assessed to fund the FAIR Plan's obligations. A FAIR Plan assessment would be an additional cost for insurers and cause further instability in the voluntary property insurance market.
- Increases the availability of commercial insurance policies in higher wildfire risk areas by requiring companies to write a number of additional policies equivalent to five percent of the company's total insurable value in order to use catastrophe models.

Consistency or Compatibility with Existing State Regulations

The proposed amendments are not inconsistent or incompatible with any other existing regulations. The proposed amendments specifically address using catastrophe models in a manner that is consistent with the existing regulatory rate-making formula and ensures that the Commissioner's system of prior rate approval remains grounded in actuarially sound principles. Additionally, these proposed amendments specifically address creating the PRID procedure to allow the public a fulsome opportunity to thoroughly investigate the inner workings of catastrophe models while at the same time respecting potentially trade-secret proprietary information of model vendors and owners.

NOT MANDATED BY FEDERAL LAW OR REGULATIONS

These regulations are not mandated by federal law. There are no existing federal regulations or statutes comparable to these proposed regulations as no federal statutes or regulations address property and casualty insurance rating factors.

OTHER STATUTORY REQUIREMENTS

The Department evaluated whether there were other requirements prescribed by statute applicable to these regulations by reviewing statutes and regulations relating to this issue and determined that there were no such requirements.

LOCAL MANDATE

The proposed regulations do not impose any mandate on local agencies or school districts. There are no costs to local agencies or school districts for which Part 7 (commencing with Section 17500) of Division 4 of the Government Code would require reimbursement.

FISCAL IMPACT

The following anticipated fiscal impacts to the Department have been identified.

PRID Procedure

The regulations state the Commissioner shall delegate the authority to oversee a PRID procedure to a Model Advisor, who has the authority to issue subpoenas, administer oaths, and control the course of the PRID procedure. The Department will incur costs in the administration of the PRID procedure, the review and analysis of catastrophe models, bringing in outside consultants, questioning expert witnesses, and judicial review of decisions. The Department anticipates that the Model Advisor will be dedicated full-time to running PRID procedures for three years. The Model Advisor is expected to need support from attorneys and legal staff in order to efficiently conduct proceedings and serve subpoenas. The Department also anticipates the Model Advisor will need support from actuaries and data specialists in order to properly evaluate catastrophe models. Additionally, attorneys will be needed to represent the Department's position during the PRID procedure, and to conduct judicial reviews. The expected additional time commitments from Department staff is equivalent to approximately 9 full-time positions and is calculated to result in a fiscal impact of $1,894,000 in year 1, $1,959,000 in year 2, and $1,958,000 in year 3.

The Model Advisor has the ability to bring in outside consultants to assist with model review. The Department anticipates needing support from outside consultants who are experts in the fields of fire science, applied mathematics, civil and mechanical engineering, actuarial science, and software development. The Department's reliance on outside consultants is expected to decrease as staff becomes more adept at evaluating models and running PRID procedures. The additional cost to bring in outside consultants is expected to result in a fiscal impact of $327,000 in year 1, $292,000 in year 2, and $179,000 in year 3.

In total, the PRID procedure is expected to result in a fiscal impact to the Department of $2,221,000 in year 1, $2,251,000 in year 2, and $2,137,000 in year 3.

Catastrophe Models

The fiscal impact analysis of the catastrophe model regulation assumes that the PRID procedure is effective in evaluating models so that additional actuarial review time of rate filings is limited. The Department assumes that senior actuarial staff will need to spend additional time in order to validate results of catastrophe models in the most complex rate filings and to redesign rate templates and indications. The Department also anticipates that staff involved in the rate approval and rate enforcement process will require additional training on catastrophe models and the new rate templates in the first year. Additional time commitments from Department staff is expected to result in a fiscal impact to the Department of $309,000 in year 1, $71,000 in year 2, and $47,000 in year 3.

Insurer Commitments

The regulation text requires the Department to update the distressed areas and data needed for insurer commitment calculations, no less than once per year. Department staff, both specialists and managers, involved in data analysis are expected to spend additional hours to calculate the data needed to populate the bulletin. The involvement of additional Department staff, including deputy commissioners, attorneys, and managers is expected to be necessary to create, write, and publish the bulletin. The fiscal impact from the bulletin is expected to decrease after the first year, as subsequent bulletins can use the first bulletin as a template.

The Department also anticipates reviewing the Wildfire Risk Portfolio Register as part of routine examinations already being conducted by Department staff. The Department conducts an average of 12 examinations, annually. The regulation is anticipated to result in an increase in the amount of time spent on each examination, as additional time is needed to analyze the register and related data, select a random sample of policies from the register, and to review polices and their underwriting files to confirm that the information in the register is correct and that the policy should count towards fulfilling the insurer commitment.

In total, the insurer commitments regulation is expected to result in a fiscal impact to the Department of $74,000 in year 1, $72,000 in year 2, and $72,000 in year 3.

Summary Matrix: Fiscal Cost Impacts

	Year 1	**Year 2**	**Year 3**
PRID Procedure	$2,221,000	$2,251,000	$2,137,000
Catastrophe Models	$309,000	$71,000	$47,000
Insurer Commitments	$74,000	$72,000	$72,000
Total	**$2,604,000**	**$2,394,000**	**$2,256,000**

The Department has determined that the proposed regulation will not impose a cost to any local agency or school district that requires reimbursement under Government Code section 17500 et seq., nor will it result in other nondiscretionary costs or savings to local agencies.

HOUSING COSTS

The proposed regulations will have no significant direct effect on housing costs, but increasing the availability of housing due to expanded coverage options will benefit the housing market, as referenced in California Governor Gavin Newsom's Executive Order N-13-23.

The regulation is not expected to directly impact housing costs. However, the expected increase in insurance availability in higher wildfire areas may impact both an individual's decision to buy a home, and housing construction and development efforts. Significant changes to housing supply or demand in an area may impact the cost of housing.

SIGNIFICANT STATEWIDE ADVERSE ECONOMIC IMPACT DIRECTLY AFFECTING BUSINESS

The Department has made an initial determination that the adoption of the proposed amendments of the regulations may have a significant, statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states. The businesses that will be affected are insurance companies writing property and casualty policies in California.

The Department has determined that insurers, modelers, and consumer representatives may follow the PRID procedure. The PRID procedure allows complex catastrophe models to be reviewed in a way that protects third-party modelers' data from competitors and facilitates public participation in the rate-making process consistent with Proposition 103. The PRID procedure is optional, and a single PRID procedure may result in a determination of required model information that may be used in multiple rate applications by unaffiliated insurers.

The Department has considered proposed alternatives that would lessen any adverse economic impact on business and invites interested parties to submit proposals. Submissions may include the following considerations:

> (i) No change to the current regulatory scheme prohibiting insurers from using catastrophe models to estimate projected losses and continue to require insurers to only rely on historical data for such estimates.
>
> (ii) A dispute pertaining to the confidentiality of information and data regarding a model that should be included in a complete rate application should not be resolved by the Model Advisor, but rather by an administrative law judge in a rate hearing.
>
> (iii) The information and data regarding a model should be approved by either the Insurance Commissioner or an expert panel of outside consultants.

STATEMENT OF RESULTS OF THE ECONOMIC IMPACT ON CALIFORNIA BUSINESS ENTERPRISES AND INDIVIDUALS

Below is a summary of the results of the results of the Economic Impact on California Business Enterprises and Individuals. A detailed analysis of the conclusions follows.

A. **The creation of jobs within the state:** The proposed regulation is estimated to result in the creation of 1053.4 jobs within the State of California. Overall, the estimated net impact of the proposed regulation on jobs is less than one-thousandth of a percent of the total projected non-farm employment in California (68.2 / 18,083,200= 0.0004%).[1]

B. **The elimination of jobs within the state:** The proposed regulation is estimated to result in the elimination of 985.2 jobs within the State of California. Overall, the estimated net impact of the proposed regulation on jobs is less than one-thousandth of a percent of the total projected non-farm employment in California (68.2 / 18,083,200= 0.0004%).

[1] California Department of Finance. California Economic Forecast-May Revise 2024-25, April 2024. https://dof.ca.gov/forecasting/economics/economic-forecasts-u-s-and-california/ Accessed June 13, 2024.

C. **The creation of new businesses within the state:** It is not anticipated that the proposed regulation will have a significant impact on the creation of new businesses in California. However, the Department does anticipate that voluntary market insurers and modeling companies will expand operations in the state.

D. **The elimination of existing businesses within the state:** It is not anticipated that the proposed regulation will have a significant impact on the elimination of existing businesses in California. However, the Department does anticipate that the FAIR plan will reduce operations in the state.

E. **The competitive advantages for businesses currently doing business within the state:** Companies that do a better job of modeling risks more granularly could have a competitive edge over those who are not using catastrophe models to quantify risk. If insurers can better quantify the charge for risk in higher wildfire risk areas, they will be more likely to target those risks.

F. **The competitive disadvantages for businesses currently doing business within the state:** Insurers who do not use catastrophe models to quantify risk may not be as competitive in higher wildfire risk areas. As a result, some policyholders that the insurer would wish to maintain may elect to leave for another insurer that is better at pricing risk.

G. **The increase of investment in the state:** Inadequate residential and commercial insurance coverage can hinder investment in California by increasing the economic and financial risks associated with those investments. Many mortgages for home purchases require the property to be insured. Increased insurance availability may increase bank lending for mortgages, an investment in California. Without properties having proper access to insurance coverage, banks will likely invest in other markets (states) where their assets will have greater protection.

   Construction and development investments are dependent on consumer demand and commercial insurance coverage. Any hinderance to consumers or businesses can impact investment into these spaces. Housing projects may end up limited in some areas with increased wildfire risk if the related costs to insure projects in those areas are too high or if consumer demand in those areas is decreased due to the perception of lack of adequate coverage and costly premiums.

H. **The decrease of investment in the state:** Permitting catastrophe modeling will involve an adjustment period in which the market will be adapting to new risk information. It is possible that better risk quantification could lead to the identification of more wildfire risks in areas lacking mitigation. Specific areas could be categorized as too high-risk, which would deter individuals and businesses from investing in these areas.

I. **The incentives for innovation in products, materials, or processes:** As modeled catastrophe losses will be a new methodology permitted in California the state could see significant innovation in the number of, and quality of models. Expanded use of advanced predictive models and enhancement of underlying datasets may improve the overall performance of future catastrophe models. Several insurers have suspended writing residential insurance policies in California, while others have left the state completely. A market with less competition often has less innovation, the goal is to bring back insurers for a more balanced and competitive marketplace.

Advanced modeling that can better identify the locations with the highest wildfire risk may lead to more precise, targeted mitigation strategies.

J. **The benefits of the regulations to the health, safety, and welfare of California residents:** The proposed regulation is expected benefit the welfare of California insurance consumers by reducing their financial risk exposure. With catastrophe modeling providing a clearer understanding of risk, insurers should be more willing to offer coverage in high wildfire risk areas, ensuring more Californians have access to coverage.

Insurance companies and government agencies may be able to use data from models to proactively educate the public on risks and preparedness, leading to better prepared communities.

POTENTIAL COST IMPACT ON REPRESENTATIVE PERSON OR BUSINESSES

- Initial costs for a typical insurance company are estimated to be $3,220,000 ($161 million direct cost / 50), with annual ongoing costs of $3.2 million for at least 3 years.
- Initial costs for a typical modeling company are estimated to be $25,800 ($0.232 million / 9 companies) to comply with requirements in the PRID procedure.
- Initial costs for a typical consumer intervenor are estimated to be $98,500 ($0.197 million / 2 companies) to comply with requirements in the PRID procedure.

BUSINESS REPORT

The Department finds that it is necessary for the health, safety or welfare of the people of the state that the regulations apply to businesses.

IMPACT ON SMALL BUSINESSES

The proposed regulation is projected to have a direct adverse impact on insurers as discussed in the foregoing analysis, however by law insurance companies are not considered small businesses (Government Code § 11342.610(b)(2)).

PRID Procedure
The PRID procedure regulation is not expected to adversely impact small businesses.

Catastrophe Models
The proposed regulation may impact the insurance rates paid by all businesses, including small businesses. Due to the regulation changing how insurance rates are calculated, some small businesses may pay more for insurance and some may pay less. There is no provision in the regulation that is expected to negatively impact small businesses disproportionately. Any

changes in the insurance rate paid by an individual small business is expected to be tied to how much of the property's wildfire risk has been mitigated and how well the insurer's catastrophe model accounts for mitigation.

Insurer Commitments
The implementation of insurer commitments is not expected to result in an adverse economic impact on small businesses. Nothing in the regulation requires a small business to pay for a commercial insurance policy. This analysis assumes that businesses will act to maximize profits and protect their investments in both property and durable goods. Some small businesses may experience an increase in costs if they elect to pay for a new commercial insurance policy and were previously uninsured. Some small businesses may pay less for insurance coverage if they were previously insured by the FAIR Plan. This analysis does not consider a business electing to purchase new or increased insurance coverage an adverse impact, as there are substantial business benefits to risk management and asset protection.

ALTERNATIVES INFORMATION

The Department must determine that no reasonable alternative considered by the Department, or that has otherwise been identified and brought to the attention of the Department, would be more effective in carrying out the purpose for which this action is proposed; would be as effective and less burdensome to affected private persons than the proposed action; or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy underlying Insurance Code sections 1861.01 *et seq.*

AVAILABILITY STATEMENTS

The Department has prepared an Initial Statement of Reasons that sets forth the reasons for the proposed action. Upon request, the Initial Statement of Reasons will be made available for inspection and copying. Requests for the Initial Statement of Reasons or questions regarding this proceeding should be directed to the contact person listed above.

The file for this proceeding includes a copy of the express terms of the proposed action, the Initial Statement of Reasons, and all the information upon which the proposed action is based, and any supplemental information, including any reports, documentation and other materials related to the proposed action that is contained in the rulemaking file. The documents described above may be inspected in person or provided electronically. Please direct such requests to the contact person above.

MODIFIED TEXT

If the amended regulations adopted by the Department differ from those which have originally been made available but are sufficiently related to the action proposed, they will be available to the public prior to the date of adoption. Interested persons should request a copy of these amended regulations prior to adoption from the contact person listed above.

FINAL STATEMENT OF REASONS

Once it has been prepared, the Final Statement of Reasons will be part of the file for this proceeding. The documents described above may be inspected in person or provided electronically. Please direct such requests to the contact person above.

INTERNET ACCESS

Documents concerning proposed regulations are available on the Department's website at the following link: https://legaldocs.insurance.ca.gov/publicdocs/RegulationList