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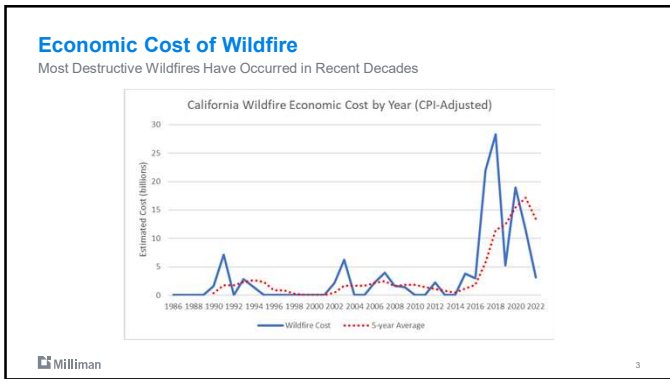
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### CDI Regulation on Wildfire Mitigation

- California Code of Regulations effective October 14, 2022
- New mandatory rating factors for
  - Community-level mitigation designations
  - Property-level mitigation
- Insurance companies have 180 days to submit rate filings that incorporate the new requirements



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### Live Poll #1

How has CCR 2644.9 impacted you?

- A. We've already submitted our California mitigation credit filing!
- B. We are still working on our California mitigation credit filing!
- C. Wait, what is CCR 2644.9?
- D. No California property programs, I'm good!

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### Actuarially Sound Mitigation Credits Are Important



Important to match rate to risk and incentivize homeowners and communities to mitigate

Doing it wrong can adversely impact availability, affordability, reliability (i.e., market stability and solvency)

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### But It's Not Easy

- The risk are not independent
- There is not a consensus about what works
- Some exposure data is not readily available
- Exposure data may change quickly
- Mitigation may be expensive or impossible due to existing built environment
- Regulatory environment may be unfavorable

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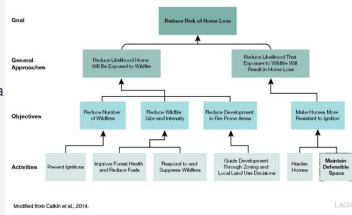
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### Types of Wildfire Mitigation

- Parcel landscaping to improve defensible space
- Infrastructure / home hardening
- Creation of buffer areas surrounding a community
- Dedensification
- Water supply development
- Firefighter access improvement



Modified from CalEPA et al., 2014.

LACIA

<https://lao.ca.gov/Publications/Report/4457>

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### Defensible Space

- Zone 0 (0-5 feet)
  - Ember-Resistant Zone (CALFIRE)
  - Home Ignition Zone (IBHS)
  - Non-combustible Zone (NFPA)
- Zone 1 (5-30 feet)
  - Lean, Clean and Green (CALFIRE)
- Zone 2 (30-100 feet)
  - Reduce Fuel (CALFIRE)

<https://wildfireprepared.org/wildfire-prepared-home-overview/>

Milliman 10

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### Home Hardening

Source: WILDFIREREADY.COM/SAFETY.COM

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### Live Poll #2

Which of these is NOT a mandatory factor under CCR 2644.9?

- A. fire-resistant vents
- B. 6" noncombustible vertical clearance
- C. enclosed eaves
- D. noncombustible gutters

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### Community Mitigation

- Coordinated planning and action to reduce fire risk throughout a community
- Fuels and vegetation management beyond the individual parcel
- Building codes and ordinances
- Citizen fire councils
- Community Wildfire Protection Plans
- CDI Mandatory factors:
  - FireWise USA Site
  - Fire Risk Reduction Community



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### Mitigation that Matters: A Wildfire Case Study



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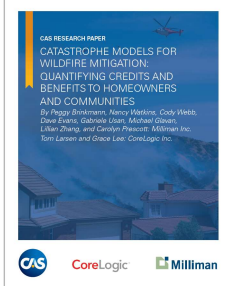
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### Casualty Actuarial Society Research Paper

- Produced by Milliman, and CoreLogic on behalf of Casualty Actuarial Society
- Published October 25, 2022
- <https://www.casact.org/publications-research/publications/cas-research-papers-and-briefs>
- Discusses wildfire mitigation, catastrophe models, actuarial considerations for mitigation credits
- Case studies to illustrate analysis methodology and compare effects of different types of mitigation



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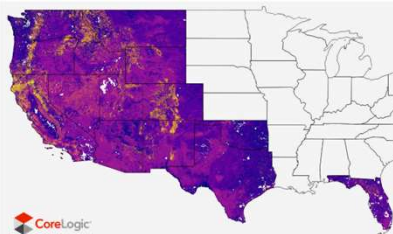
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**CoreLogic RQE® Wildland Fire model**

- Over 3 million simulated events + all major historical wildfires
- Covers attritional and catastrophe wildland fire
- Fire and smoke modeling
- Geo-spatial wildfire behavior model integrates surface and crown fire spread
- Weather simulation captures spatial-temporal variability and extremes



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**Why Use a Catastrophe Model?**

- Historical data is sparse and extreme
- Historical data may not capture status of pre-event mitigation
- Historical data may not reflect future conditions
- Catastrophe models can incorporate latest technologies, data, and research

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**Live Poll #3**

How do you use Wildfire catastrophe simulation models?

- A. I use them for ratemaking
- B. I use them for exposure management
- C. I use other data for assessing wildfire risk
- D. I don't analyze wildfire risk

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### ASOP 38 Considerations

<b>Appropriate reliance on experts</b> <ul style="list-style-type: none"> <li>Are the developers experts in the field?</li> <li>Has the model been reviewed by other experts?</li> <li>Are there applicable industry or regulatory standards?</li> </ul>	<b>Understanding the model</b> <ul style="list-style-type: none"> <li>Model components</li> <li>Model inputs</li> <li>Model outputs</li> </ul>
<b>Appropriateness of model for project</b> <ul style="list-style-type: none"> <li>What are the limitations of the model?</li> </ul>	<b>Appropriate validation</b> <ul style="list-style-type: none"> <li>How historical observations compare to model results</li> <li>Consistency and reasonableness of output</li> <li>Sensitivity of model outputs to model inputs</li> </ul>

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### Model Validation

<b>Typical Model Validation:</b> Validate separate model components on past data to see if the model reproduces event losses reasonably well	<b>Also Consider:</b> <ul style="list-style-type: none"> <li>Model error</li> <li>Parameter error</li> <li>Sampling error</li> <li>Logical relationships between inputs and outputs</li> <li>Transparency</li> </ul>
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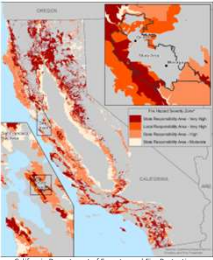
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### Case Study Data



**Model Inputs**


- Census block centroids + all combinations of mitigation for a base risk
- Actual parcels + best estimates of actual distribution of mitigation characteristics, Coverage A, Year Built

**Model Outputs**

CoreLogic Wildfire Model Average Annual Loss (AAL)

**Study Area**

City of Orinda and Town of Moraga

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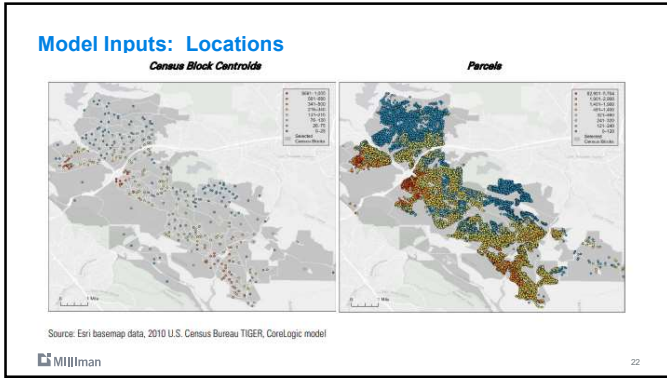
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### ASOP 12 Considerations

<b>Selection of risk characteristics</b> <ul style="list-style-type: none"> <li>Related to expected outcomes</li> <li>Can be objectively determined</li> <li>Practical to obtain (time, cost)</li> <li>Compliant with applicable law</li> </ul>	<b>Establishing risk classes</b> <ul style="list-style-type: none"> <li>Appropriate for intended use</li> <li>Credibility</li> <li>Practicality (to assign appropriate class)</li> <li>Reasonableness of results</li> </ul>	<b>Testing long-term viability</b> <ul style="list-style-type: none"> <li>Assess potential effects of adverse selection</li> <li>Consider sub-classes</li> <li>Effects of changes</li> </ul>
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### Model Inputs: Mitigation Characteristics

Model Variable	Model Input Data	
Occupancy	Centroid Locations	Parcel Locations
Coverage A (Dwelling)	Residential	Residential
Coverage B (Other Structures)	\$400,000	Actual
Coverage C (Contents)	\$40,000	7.5% of A
Coverage D (Loss of Use)	\$200,000	60.0% of A
Deductible	\$100,000	20.0% of A
	\$1,000	0.5% of A
Structure Type	Frame, Noncombustible, Fire Resistant	Estimated Distribution
Year Built	1955	Actual
Number of Stories	1, 2	Estimated Distribution
Roofing Fire Class	Classes A, B, C, and Unrated	Estimated Distribution
Clearance—Noncombustible Zone	Yes, No	Estimated Distribution
Clearance—Lean, Clean, and Green Zone	Yes, No	Estimated Distribution
Clearance—Reduced Fuel Zone	Yes, No	Estimated Distribution
Fire-Resistive Siding	Yes, No	Estimated Distribution
External Fire Extinguisher	No	Estimated Distribution
Combustible Attachments	Yes, No	Estimated Distribution
Fire-Resistive Windows	Yes, No	Estimated Distribution

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### Case Study 1 – Individual Mitigation Credits

Methodology:

- o Analyze losses relative to the base, unmitigated risk
- o Use GLMs to determine which variables interact with each other to design mitigation factor table
- o Examine interactions between geography and mitigation variables to create territories



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### Selecting Interaction Effects

Interaction Number	Variable—Level	Coefficient	Standard Error	Pri-> t
1	Roofing Fire Class B: Clearance—Lean, Clean, and Green (No)	-0.13	0.00	0.0000
1	Roofing Fire Class C: Clearance—Lean, Clean, and Green (No)	-0.15	0.00	0.0000
1	Roofing Fire Class U: Clearance—Lean, Clean, and Green (No)	-0.15	0.00	0.0000
2	Roofing Fire Class B: Clearance—Reduced Fuel Zone (No)	-0.11	0.00	0.0000
2	Roofing Fire Class C: Clearance—Reduced Fuel Zone (No)	-0.14	0.00	0.0000
2	Roofing Fire Class U: Clearance—Reduced Fuel Zone (No)	-0.13	0.00	0.0000
3	Roofing Fire Class B: Clearance—Noncombustible Zone (No)	-0.07	0.00	0.0000
3	Roofing Fire Class C: Clearance—Noncombustible Zone (No)	-0.09	0.00	0.0000
3	Roofing Fire Class U: Clearance—Noncombustible Zone (No)	-0.09	0.00	0.0000
4	Roofing Fire Class B: Combustible Attachments (No)	0.07	0.00	0.0000
4	Roofing Fire Class C: Combustible Attachments (No)	0.09	0.00	0.0000
4	Roofing Fire Class U: Combustible Attachments (No)	0.09	0.00	0.0000
5	Clearance—Lean, Clean, and Green (No): Clearance—Reduced Fuel Zone (No)	-0.26	0.00	0.0000
6	Clearance—Lean, Clean, and Green (No): Clearance—Noncombustible Zone (No)	-0.05	0.00	0.0000
7	Clearance—Lean, Clean, and Green (No): Combustible Attachments (No)	0.05	0.00	0.0000
8	Clearance—Reduced Fuel Zone (No): Clearance—Noncombustible Zone (No)	-0.04	0.00	0.0000
9	Clearance—Reduced Fuel Zone (No): Combustible Attachments (No)	0.04	0.00	0.0000
10	Clearance—Noncombustible Zone (No): Combustible Attachments (No)	0.37	0.00	0.0000

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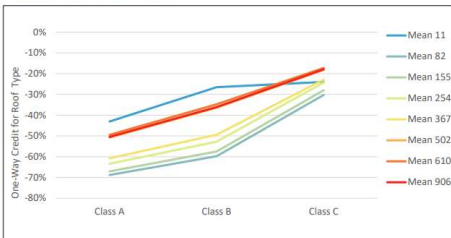
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### Interactions with Geography

Figure 4.4. Cluster credit by roof type



- K-means cluster of census block base risk AALs
- Test interactions with census block clusters
- Further group similar clusters into territories

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### Case Study 1 – Findings

- Roof replacements are the most impactful mitigation action, but roof replacements are expensive and infrequent
- If the roof cannot be replaced, maintaining the clearance zones is the next most impactful action. Largest risk reductions were observed from clearing the 5-30 foot zone, then the 0-5 feet zone, then the 30-100 feet zone
- Incremental effect of any given mitigation action is sensitive to geographic location and other mitigation actions

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### Case Study 2 – Community Mitigation Credits



The risk to a community is based on its layout and fuel characteristics. If layout is a given, what can be done at a community level to impact fuel?

Methodology:

- o Modify underlying fuel story to use main fuel type but decrease "load". For example, moderate and high timber litter load were modified to be low timber litter load
- o Compare expected losses to scenario with current fuel load

This represents an aggressive community fuel maintenance project in which the fundamental nature of the landscape wasn't changed

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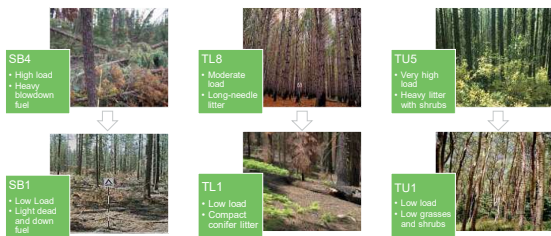
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### Examples of Fuel Category Modifications



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**Implementation Challenges**

- Need to start with adequate rates!
- Getting data on property-level mitigations
- Getting current data on defensible space
- Getting data on community-level mitigation, and translating it into model inputs
- Avoiding overlap with territory and other rating plan factors

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**How to Move Forward**

Problem	Solution
The risks are not independent	Model at a community level
There is not a consensus about what works	Consider multiple methodologies
Exposure data is not available/changes quickly	Open data commons
Mitigation may be expensive or impossible	Apply mitigation with best cost/benefit
Regulatory environment may be unfavorable	Promote regulation allowing rate adequacy and all costs reflected in rates

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**Lessons Learned**

Wildfire is a complex risk that needs to be understood and mitigated by a variety of stakeholders including actuaries, catastrophe modelers, community leaders and fire experts, and policymakers. Mitigation matters, but it's important to quantify the impact of any efforts through a scientific methodology.

Catastrophe models are the best way currently to quantify and understand mitigation efforts, but transparency is key in order to understand the results of these models.

This study presents illustrative results only and is intended as a road map to better understanding the cost-benefit of mitigation credits; it is not prescriptive. Different geographies, property data, catastrophe models and other variables will affect the findings of this study.

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### Wildfires and Risk Modeling

- What does a wildfire look like? The Paradise Fire timeline
- Anatomy of a wildfire. What are the key elements?
- Components of a wildfire risk model
- Model validation challenges

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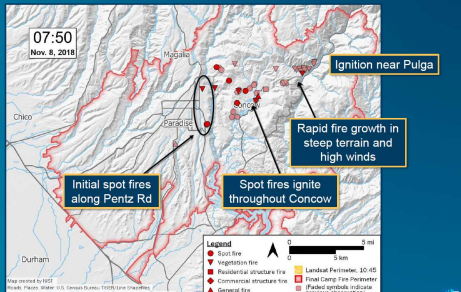
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### Fire Progression Summary 06:15 to 07:50



From: <http://www.nist.gov/publications/case-study-camp-fire-fire-progression-timeline>

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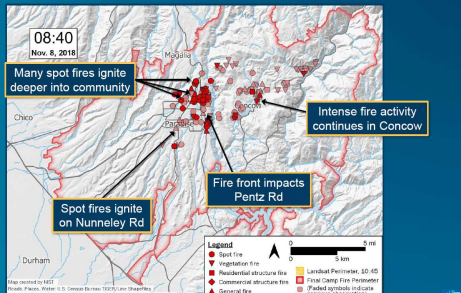
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### Fire Progression Summary 07:50 to 08:40



Map created by NIST  
 Public Report: NIST Case Studies Series 1010-1-1 Paradise Fire  
 Fire Daily Fire Perimeter  
 Fire Daily Fire Perimeter  
 Fire Daily Fire Perimeter  
 Fire Daily Fire Perimeter

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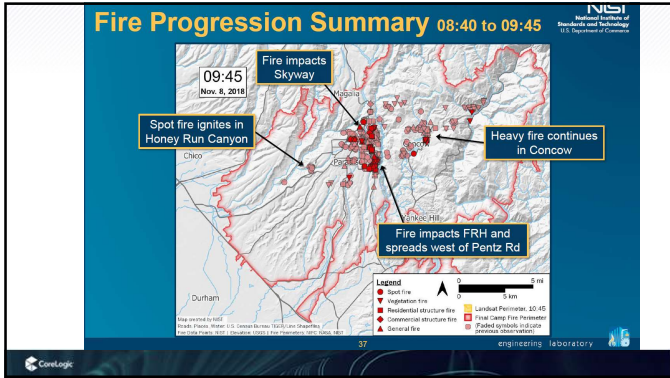
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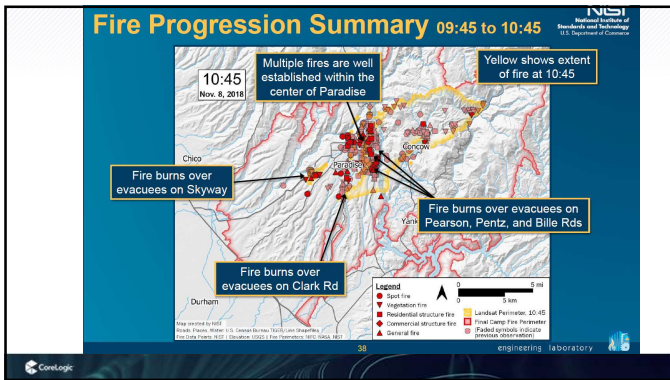
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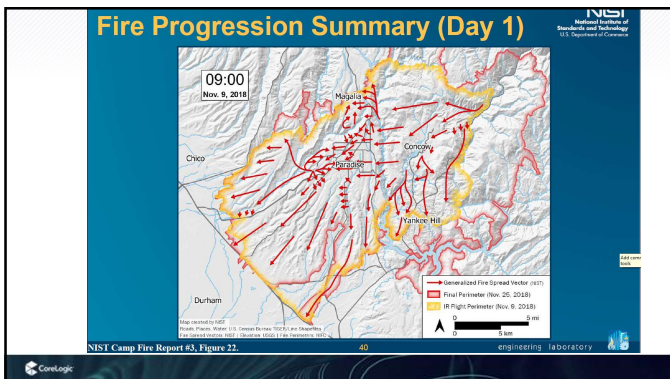
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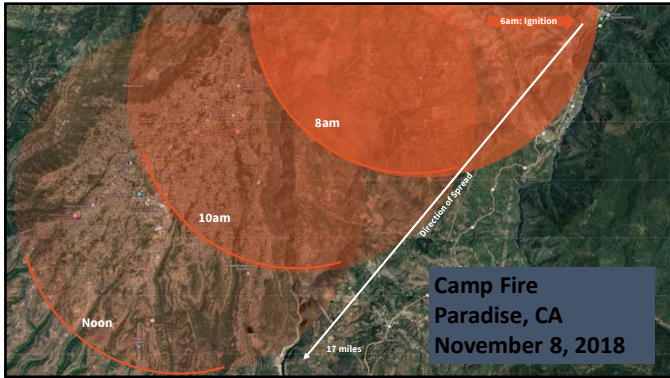
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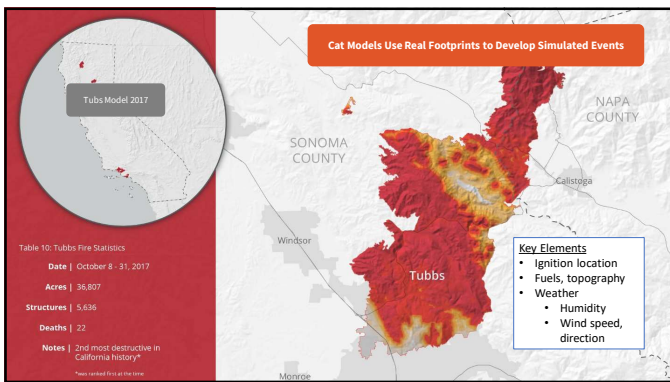
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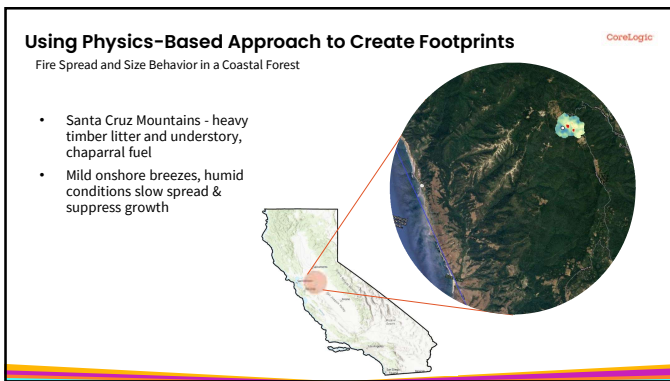
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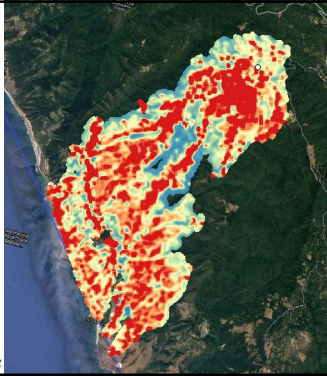


### Fire Spread is Not Uniform

Millions of Simulated Events Representative of Real Fires

Rapid spread during offshore dry-wind events in late summer-fall season

- Heavy Timber Litter and Understory chaparral fuels creates larger fires



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### Notable recent wildfires

Common elements – short duration for damage

Fire	Wind	Structures	Duration
Tubbs 2017	60 mph	5,643	8 hrs
Camp 2018	35 mph	18,804	8 hrs
Marshall 2021	115 mph	1,084	6 hrs

The physical fire lasted much longer. Most damage to property occurred in the initial period

Most property losses occur while fire services are focused on protecting lives, or as they transition to defending property



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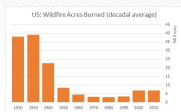
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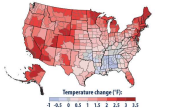
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### CA Wildfire Risk: The future does not look like the past

- Wildfire fuel (unburnt vegetation) is increasing every year
- Summers are getting longer and hotter (climate change)
- Housing growth in WUI continues unabated
- New forestry management mitigation programs are being introduced
- In total
  - We cannot expect the future risk of wildfires to mimic the past
  - Planning requires something beyond experience rating





Growth in CA WUI  
33% more in 20 years

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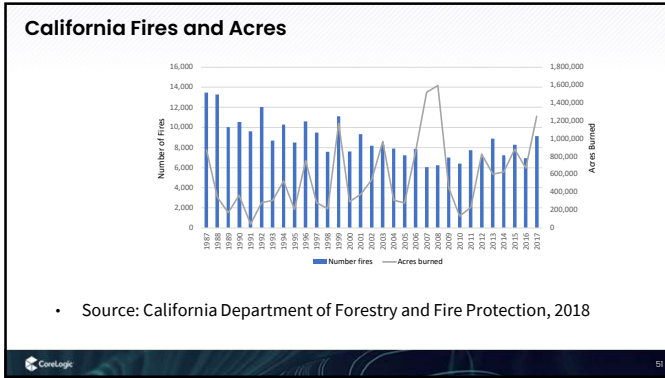
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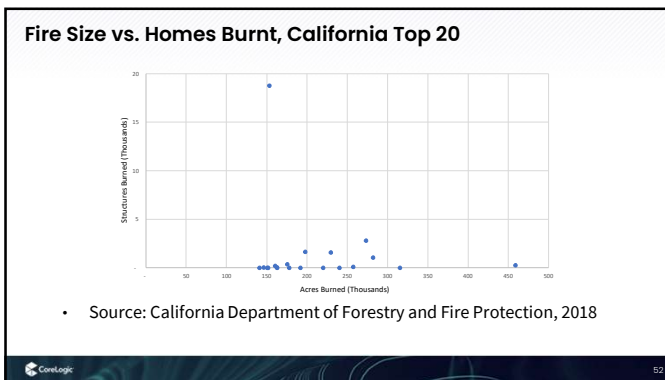
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### The key elements to a wildland fire

- Weather includes temperature, wind speed and direction, humidity
- Topography is shape of the land, as well as elevation, slope and aspect.
- Fuels - moisture level, chemical makeup, and density - the degree of flammability

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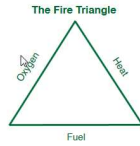
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### Characteristics of large fires in California

Understanding the peril of extreme fires

- Late season (**Fuel**)
  - largest fires were between September and November
  - California dry summer weather pattern produces the fuel necessary for a fire
- High winds for multiple days (**Oxygen**)
  - High winds provide the oxygen necessary for a large fire
- Suburban concentrations in and near wildland areas (**Heat/Ignition**)
  - Human activities provide the "heat" in the form of incidental ignitions




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### The fluid dynamics of wildfire

- The influence of the fire-atmosphere coupling is much greater in wildland fires than in building fires.
  - The influence of the fire-atmosphere coupling is much greater in wildland fires than in building fires.
  - wildland fuels are primarily fine, they are also efficiently cooled when the surrounding ambient air is cooler than they are. That means that the indraft of air caused by a fire may actually impede its spread.

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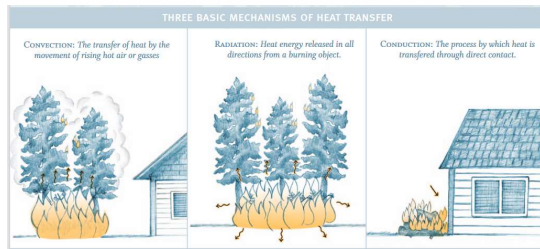
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### Understanding Fire Behavior

Heat Transfer



From: <https://www.srs.fs.usda.gov/factsheet/pdf/fire-understanding.pdf>

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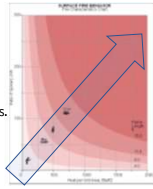
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### Anticipating ultimate fire losses

Modeling the physics of a wildfire

Increasing fireline intensity equates to increasing difficulty to fight fire

- Wildland fires are distinct from smaller fires
  - Driven by winds
  - Influenced by fuel loads and topography
- The shape and eventual extent of the fire are driven by many localized geographic and climate factors
- As fireline intensity increases, the ability to constrain the fire decreases.
  - Hand crews can only fight fires to a certain size
- Slope plays a secondary impact
  - The inability to maneuver heavy equipment can impede fire fighting



Source: Wildfire Science Institute, Modeling Wildland Fire Behavior, Fire & Ignition Technology Transfer, April 2011, www.wildfire.com

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### Wildland Fire – not like other loss perils

Wildland fire is a full loss peril

- Fires destroy the entire building and stresses the 100% reconstruction cost for the policy
  - Not even hurricanes or earthquakes cause widespread 100% loss severity
  - Under-insurance will be exposed in a wildfire
- California Dept of Insurance (CDI) may be increasing costs for contents and ALE coverage<sup>1</sup> beyond historic claims
- Coverage C loss exposure remains ambiguous
  - Valuation methods not as rigorous as for Coverage A



Larkfield area, Santa Rosa Fires, 2017

1: <http://www.insurance.ca.gov/0403-renew/01100-press-releases/2018/april04/nr08R0101ce Expedited Claims Procedures.pdf>

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### Roofing Type Classes

(Based on UL 790 (ASTM E 108) Standard Test Method)

- **Class "A"**: The highest fire-resistance rating for roofing as per ASTM E-108. Indicates roofing can withstand severe exposure to fire originating from sources outside the building.
- **Class "B"**: Fire-resistance rating that indicates roofing materials can withstand moderate exposure to fire originating from sources outside the building
- **Class "C"**: Fire-resistance rating that indicates roofing materials can withstand light exposure to fire originating from sources outside the building
- **Class "U"**: Unrated e.g. Wood Shingle
- Default Class is set to "U" unless we can smart default on Building Code



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### Additional Secondary Structure Modifiers

- **Fire Resistive Siding**
- **Fire Resistive Windows**
- **Non Combustible Attachments**
  - Fences + Decks
- **Automatic External Fire Extinguishing System**
  - The most effective protection
  - Needs water reservoir, pump and electric supply with battery back-up to be fully effective
- **Structure Fire Vulnerability Mitigated**
  - Ensuring Fire Embers cannot enter the structure by using screening across ventilation, protecting eaves
  - No accumulation of debris on roofs and in gutters

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### Perimeter Clearance

CALFire Defensible Zones endorsed by the Insurance Institute for Business & Home Safety (IBHS)

Description	Clearance Range
Lean, Clean and Green Zone	0' to 30'
Reduced Fuel Zone	30' to 100'
Non combustibile Zone	0' to 5'



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### Mitigation Strategies



California Department of Forestry and Fire Protection  
**Homeowners Checklist**  
How To Make Your Home Fire Safe

Attribution: CAL Fire <http://www.calfire.ca.gov>



Top 10 Ways to Protect Your Home from Wildfire

Attribution: IBHS <http://firestoppersafety.org/legal/>

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**Mitigation Examples (IBHS Examples)**

Underneath decks

Unenclosed

Debris

Unenclosed eaves Vents

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**Validating a Wildfire model with experience data**

Some techniques from hurricanes and earthquakes won't work

- Loss experience model comparisons for HU and EQ work well
  - Hurricane Andrew generated about 2M claims
  - Northridge EQ affected about 3M homes
  - As of 25 October, Hurricane Ian has ~600k claims<sup>1</sup>
- Wildfires and SCS are different
  - Large wildfire is 10,000 homes
  - Large thunderstorm damages 5,000 homes
- How the loss-experience is brought forward for comparison to model results on today's portfolio has a large influence on results

1 - <https://www.flor.com/home/ian>, 1 Nov 2022

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**One example from wildfire**

San Diego, CA

- Observation: (apparent) big model mis-match in re-simulation of San Diego wildfires in 2003 and 2007
  - State-wide housing growth is about 2% per year
  - Within the fire footprints, housing growth was about 4% per year (much higher than state, county averages).
  - Re-analysis of today portfolio showed losses than did not agree
- Earthquakes and Hurricanes affect enormous areas, and small-scale anomalies are averaged out
  - Hurricane Ian claims represent 8% of entire state!
  - Not true for SCS or wildfire

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### Managing and Mitigating wildfire

Proceeding to a manageable level of risk

- Wildfire has 3 critical aspects
  - Ignition
    - Related to human activities. Can be reduced but not eliminated
  - Fire spread to homes
    - Regional fuel reduction to slow fire, make it fightable
  - Home destruction
    - Harden homes. Can reduce but not eliminate risk.



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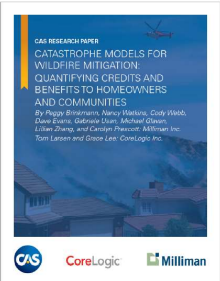


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### Making models work

Casualty Actuarial Society Research Paper

2 rate-making studies

- Mitigation credits for as-is regional fuels
- Mitigation credits for mitigated fuels
- Fully mitigated *could* reduce rates ~35%
  - Much of this is already in-place
- De-risking (eliminating ladder-fuels in forested areas)
  - Additional 35% drop
- <https://www.casact.org/publications-research/publications/cas-research-papers-and-books>

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### Ladder-fuel reduction

Only a part of the solution

- The goal is to lower fire intensities and ladder-fuels are an important aspect of fire intensity
  - Ladder fuels are not the only component
  - For achievable risk reduction, fuel reduction must be verifiable
    - Imagery fails
    - LIDAR point clouds need to be very dense to achieve credible results
- More research is needed to identify achievable and verifiable risk reduction



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**So where do we go from here**

The future of wildfire risk

- Ignitions can be reduced
  - But never eliminated
- Fuels can be mitigated
  - New remote surveillance technology can perform audits
- Risk can be modelled
  - Regulatory and market barriers persist



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