

**Fw: Stakeholder input for the SB-254 Natural Catastrophe Resiliency Study**

**From** SB254Questions <SB254Questions@calquake.com>

**Sent:** Saturday, November 29, 2025 10:40

**To:** SB254Questions <SB254Questions@calquake.com>

**Subject:** Stakeholder input for the SB-254 Natural Catastrophe Resiliency Study

Note: please do not include my email address in any report. Thank you.

Dear Wildfire Fund Administrator and CCR Council,

For the last 5 years, I have been writing wildfire preparedness tips and insurance news for my Town. As much as I have learned, it always amazes me how many more things, that I don't know about, keep popping up.

So, via a recent CA Wildfire Task Force newsletter, I learned about Newsom's Exec Order N-34-25 and the SB-254 study. I learned that the CA Wildfire Fund will likely be exhausted by the Eaton Fire. And most alarming of all, I learned that private equity is profiting by buying at a discount, utilities' claims to the Wildfire Fund's monies. I know little about economics or banking, but I assume that utilities discount the "free money" from this fund in order to get quick capital.

Here are my candid assessments:

- This subrogation of funds must stop. Ratepayers do not even know they are paying into a fund that may largely benefit private equity firms. This is far worse than inequitable allocation of natural catastrophe burden: this is private profiteering from public catastrophe and a gaping donut hole in government fund administration. The Wildfire Fund and its replacement should disallow subrogation.
- The California public should be plainly told how much (total dollars and percent) of the fund is going to private equity and subrogation. Perhaps this could be transparently publicized on the CEA website, similar to how CDI now posts statistics about [the FAIR plan](#).
- For additional transparency, the CEA should follow the example of the BOF as shown by its webpage for the [Zone Zero Regulation Advisory Committee](#). It's good that CEA posts the Council minutes, but the public should also be able to easily subscribe to advance meeting agendas of the Council, as well as any open public meetings or workgroups on the Natural Catastrophe Resiliency Study. CEA should also post the meeting recordings in a place where the public can easily find them.

As far as new ideas to address risk, I have a suggestion. The CAL FIRE Fire Hazard Severity Zone maps only educate the public about hazard, which doesn't change much, so the public doesn't have a good idea about their individual and community risk. For several years, I have asked the companies who provide insurers with property intelligence and risk assessments, if they had a subscription plan for governments and volunteer organizations. None of them do and most won't even return my sales call.

But I wish I were able to show my community how the insurance companies see homeowners' properties. While enforcement and neighbor-to-neighbor are the major tools for encouraging community mitigation, in my experience, retaining insurance is becoming the #1 motivator for homeowner action. If we could proactively show homeowners their risk, way ahead of insurance renewal time, it would be speed up individual and community mitigation.

Milliman's Nancy Watkins seeks to do the same thing with the WUI Data Commons, which I support as a public vehicle. But I also feel that the proprietary commercial platforms have been honing their capabilities over the past 3 years, and the public could understand their risk so much faster if the Council could investigate a public-private partnership to reveal an insurer's viewpoint of wildfire risk.

Thank you for your time in considering these suggestions.

Regards,  
-mj Lee, volunteer  
Portola Valley, CA