



State Senator Ben Allen

Candidate Questionnaire: California Insurance Commissioner

November 2026 General Election

Instructions to Candidates

*Please provide complete, specific answers to each question. Responses will be unedited and shared with independent insurance agents and brokers throughout California and may be published in industry communications. Please return completed questionnaires by **Sept. 18, 2026** to Stephen L. Young, IIABCal General Counsel, at syoung@iibcal.org.*

Reinsurance Cost Recognition & Catastrophe Modeling in Rate Filings

Q1: Do you support allowing insurers to include reinsurance costs in California rate filings, and to use forward-looking catastrophe models (rather than solely historical loss data)— provided they are using PRID-approved models, and have met requirements to write more policies in underserved areas? Please explain your position and any conditions you would place on such use.

Reinsurance is part of the cost of doing business in a catastrophe-exposed state, and if we want insurers to write in California, the Department has to be able to consider the real economics of the market.

But that does not mean insurers should get a blank check. Any consideration of reinsurance costs should be subject to review, documentation, and limits to ensure that consumers are only paying costs that are reasonable and justified.

I also support modernizing the tools available to the Department, including the use of forward-looking catastrophe modeling with strong guardrails, transparency, and accountability.

Q2: How would you balance the need for rate adequacy with consumer protection against excessive rates?

I do not see those as opposing goals. Consumers are not protected if they cannot find coverage. They are also not protected if they are charged excessive rates or mistreated during claims.

The job is to make the market function in a way that is fair, available, and accountable. That means insurers should be able to receive timely decisions when they provide adequate justification, but they should also be expected to write in California, serve high-risk areas, recognize mitigation, and treat policyholders fairly.

We cannot solve this by being reflexively anti-industry or reflexively pro-industry. We need a Commissioner who is pro-consumer, practical, and willing to bring all sides to the table.

Expedited Rate Review Process

Q3: What staffing, technology, or process changes would you prioritize at CDI to reduce rate filing backlogs and expedite rate reviews?

Rate review has to work faster. Consumers need predictability, companies need predictability, and the Department needs the capacity and tools to make timely decisions.

But I do not believe the answer is to simply throw out the public's role in the process. Third-party intervenors are part of California's consumer protection framework, and I do not think cutting the public out is a silver bullet.

There are practical steps we can take: expand capacity within the Department, set clearer expectations for what insurers must provide in their filings, improve front-end completeness review, use better technology and data systems, and ensure that intervenor participation is focused and adds value rather than delay.

The goal should be rate review that takes months, not years, while still protecting consumers from unjustified increases.

Insurer Commitments to Underwrite in High-Risk Areas

Q4: The SIS requires insurers receiving rate relief to write a proportional share of policies in high-risk areas, including wildfire-prone communities. Do you support this "give-and-get" framework? How would you define "high-risk" areas for purposes of insurer writing obligations, and how often would those designations be updated?

I support the "give-and-get" framework. If insurers receive access to modernized ratemaking tools, consumers should receive a meaningful commitment that more coverage will be written in wildfire-distressed communities.

High-risk areas should be identified using CAL FIRE Fire Hazard Severity Zones, insurance-availability data, FAIR Plan concentration, and CDI's Safer from Wildfires framework. These designations should be reviewed regularly and updated to recognize community-level mitigation and changing conditions. The Department must also verify that insurers fulfill their writing commitments and take enforcement action when they do not.

Wildfire Mitigation Discounts and Credits

Q5: Do you support requiring insurers to offer premium discounts to homeowners and businesses that take documented wildfire mitigation steps? How would you standardize and verify mitigation discounts or credits were actuarially credible?

Absolutely. I introduced SB 894 to create a state-backed, low-interest loan program to make home hardening retrofits more accessible. Standardized discount programs should follow CDI's Safer from Wildfires standards and be verified using certified inspector programs (such as AB 1143) to ensure actuarial credibility without creating administrative burdens for independent agents. Discounts and underwriting decisions should recognize both property-level improvements and verified community-level mitigation, including vegetation management, defensible space, evacuation planning, and Firewise or comparable designations.

Q6: How would you work with local governments, CAL FIRE, and insurers to promote and fund wildfire mitigation efforts in underserved communities?

Using funds secured through Prop 4, I will work to direct state grant capital directly to local fire safe councils, CAL FIRE, and regional municipalities in disadvantaged, high-risk communities to fund public vegetation management and subsidized home-hardening programs.

I would also use CDI data to identify communities with high FAIR Plan enrollment and limited private coverage, coordinate investments with CAL FIRE and local governments, and require insurers to explain how completed mitigation will affect underwriting, availability, and premiums.

Reducing FAIR Plan Enrollment

Q7: What is your overall strategy for depopulating the FAIR Plan and returning policyholders to the admitted market, while also assuring the consumers do not end up in a less advantageous policy?

Reducing reliance on the FAIR Plan and restoring a functional private insurance market must be the central goal of the Department of Insurance. I would take four specific steps:

First, California must continue investing in wildfire risk reduction so that communities become safer and more insurable. The Department should work with CAL FIRE and local governments to identify communities with high concentrations of FAIR Plan policies and develop targeted roadmaps for reducing risk and restoring access to private coverage. I introduced SB 894 this session to provide low-interest, state-backed loans to help homeowners afford wildfire safety upgrades.

Second, homeowners and communities must see clear insurance benefits when they invest in reducing risk. I would prioritize transitioning FAIR Plan policyholders who meet Safer from Wildfire standards back into the private market and ensure insurers recognize and reward specific fire-hardening improvements when underwriting policies.

Third, the FAIR Plan must remain financially sound so it can pay claims when disasters occur. The recent use of IBank bonding authority is an important step. If adjustments to rates are necessary to maintain solvency, they should be carefully evaluated by the

Department while ensuring affordability and keeping the FAIR Plan as a last-resort safety net, not a permanent substitute for private coverage.

Fourth, communities rebuilding after major disasters should have the support needed to rebuild in ways that reduce future risk. Incorporating fire-resistant construction and community-level mitigation into rebuilding can help ensure that affected areas become safer and more insurable over time.

FAIR Plan Financial Stability

Q8: Given the FAIR Plan's exposure concentration in wildfire-prone areas, do you support and will you follow existing law requiring FAIR Plan rates to be actuarially commensurate with the exposures being underwritten?

Yes. I will follow existing law requiring FAIR Plan rates to be actuarially commensurate with the exposures being underwritten. Maintaining actuarially sound rates is necessary to ensure the Plan can pay claims and remain a reliable safety net after a major catastrophe.

At the same time, actuarial adequacy should not mean unchecked rate increases. Rate requests must be supported by credible evidence, transparently reviewed by the Department, and account for property- and community-level mitigation that reduces risk. We must also address affordability through targeted mitigation assistance and broader efforts to restore competition—not by setting inadequate rates that threaten the FAIR Plan's solvency or shift costs unpredictably onto the rest of the market.

Q9: What other steps, if any, do you support to strengthen the Plan's financial structure? What role, if any, should the state play in backstopping FAIR Plan losses?

The FAIR Plan needs a durable financial structure capable of paying claims after a major catastrophe without destabilizing insurers or imposing sudden, unaffordable costs on policyholders. I helped pass legislation authorizing IBank financing for the FAIR Plan, providing an important tool to pay claims promptly and spread extraordinary costs over time.

I also support maintaining actuarially sound rates, strengthening reserves, responsibly purchasing reinsurance, and improving catastrophe planning. The state should provide financing and liquidity tools when necessary, but the General Fund should not become the FAIR Plan's permanent backstop. Any state assistance should preserve the Plan's role as an industry-supported insurer of last resort and include strong fiscal oversight and a credible repayment structure.

Q10: Do you support current CDI rules allowing insurers to recoup some or all of any FAIR Plan assessments following a major loss event?

The current cycle of major FAIR Plan assessments followed by costs passed on to policyholders is not sustainable. While existing rules may provide a necessary mechanism for responding to extraordinary losses, our goal must be to avoid assessments in the first place.

That requires strengthening the FAIR Plan's financial structure, maintaining adequate reserves, responsibly using reinsurance and IBank financing, and restoring more homeowners to the admitted market. When an assessment cannot be avoided, any recovery must be transparent, carefully reviewed, spread over time, and structured to protect consumers from sudden rate shocks. Insurers should remain responsible for their appropriate share and should not profit from assessment recoveries.

FAIR Plan Coverage Adequacy

Q11: Currently, the FAIR Plan offers limited coverage compared to standard homeowners policies. Do you support expanding FAIR Plan coverage options (e.g., liability, loss of use, personal property) while the Plan remains a market of last resort?

The FAIR Plan must provide sufficient coverage to protect policyholders, but it must remain the insurer of last resort—not become a government-backed competitor to the admitted market. I support evaluating targeted coverage improvements where consumers face serious gaps, while preserving incentives for insurers to offer comprehensive private coverage.

Any expansion must be actuarially sound, clearly disclosed, and narrowly tailored. Our primary goal should be restoring a competitive admitted market and moving consumers off the FAIR Plan whenever suitable private coverage becomes available.

Education and Licensing Pathways

Q12: What role do you believe the CDI should play in promoting insurance as a career to young Californians, including outreach to high schools, community colleges, and universities?

CDI should actively promote insurance as a stable and meaningful career, particularly as the industry faces an aging workforce and increasingly complex risks. I would work with high schools, community colleges, universities, producer associations, and insurers to introduce students to careers in insurance, claims, underwriting, actuarial science, risk management, and consumer protection.

The Department should also modernize and clarify licensing pathways, support internships and apprenticeships, and expand outreach to communities historically underrepresented in the industry. Independent agents and brokers should be central partners because they can provide students with direct exposure to the profession and opportunities in communities throughout California.

Technology, Innovation, and the Next Generation

Q13 How would you ensure that technological innovation in insurance distribution does not actually harm consumers or displace or disadvantage independent agents and brokers relative to direct-to-consumer models?

California needs to use modern tools to understand modern risk. Backward-looking data alone is not enough in a world where wildfire, climate impacts, and rebuilding costs are changing quickly.

But catastrophe models cannot be a black box that simply produces higher premiums without public accountability. There needs to be transparency, review, standards, and a clear understanding of how mitigation is incorporated.

I also support the development of public modeling capacity so California is not entirely dependent on private models. The public deserves confidence that these tools are being used fairly and accurately.

Agent and Broker Input at CDI

Q14: Would you commit to regular consultation with IIABCal and other producer associations, including town halls or advisory committee participation?

Yes. It is a practice in my office to constantly consult our communities and experts through advisory committees, town halls, and more.

Climate Risk, Resilience, and Long-Term Market Sustainability

Q15: How do you view the Commissioner's role in addressing the intersection of climate change and insurance market availability? What is the appropriate scope of CDI action on climate risk?

Here's the reality: California insurance is now a climate-driven "risk and affordability" balancing act - losses are more volatile, pricing is changing, and if we don't pair modernization with consumer safeguards and real resilience, families get priced out.

Some insurers' investments and industrial underwriting have exposed them to greater climate-related financial risks than others, threatening both the industry and its Californian customers. I will restore past transparency programs that revealed insurers' fossil fuel investments and require regular gold-standard stress testing to prevent insurers from underwriting or bankrolling risky fossil projects. I support efforts to ensure fossil fuel companies bear appropriate financial responsibility for climate damages that are driving insurance costs up for everyone.

Regulatory Philosophy and CDI Operations

Q16: What qualifications, experiences, and relationships do you bring to this office that make you the best candidate to address California's insurance crisis?

I have spent a decade in the State Senate working on consumer protection, insurance industry accountability, political transparency, ethics, and reform, environmental health, and climate resilience. These are core responsibilities of the Insurance Commissioner. My experience includes negotiating SB 54 on plastic pollution and writing Proposition 4, which voters approved by a 20% margin to fund clean water, wildfire prevention and climate resilience projects.

I have built a reputation for finding solutions in areas where stakeholders often disagree. I understand how to bring consumer advocates, community organizations, and industry leaders into the same room to reach practical and sustainable outcomes. This collaborative approach is essential for stabilizing the insurance market.

I also bring personal experience. My own community has faced wildfire in Los Angeles. This gives me a grounded understanding of what families are going through.

For voters, I will emphasize:

- A track record of solving complex, high-stakes problems
- Independence from corporate interests
- Experience stabilizing markets while protecting consumers
- Deep ties to diverse LA communities, including AANHPI families
- A climate-forward vision for rebuilding trust in our insurance system

Q17: What are your top three priorities for CDI in your first 100 days as Commissioner?

Three things. One — enforcement. Make companies keep the promises they sold, and fine them when they don't. I wrote the law that lets the state do that. Two — competition. Get more companies writing policies here, because when there's only one game in town, you pay whatever they ask. Three — cut the risk, with brush clearance, home hardening and real fire prevention, because the cheapest fire is the one that never happens. Do those three things and prices will come down and coverage will

come back. It's not exciting. But it's the boring, heavy lifting that will actually lower what people pay.

SUBMISSION INSTRUCTIONS

Item Details

Response

Deadline Sept. 18, 2026

Submit To syoung@iiabcal.org

Format PDF or Word document preferred

Length Guidance No strict limit; concise and specific answers preferred

Publication Responses will be shared with member agents, brokers, and the public

This questionnaire was prepared by IIABCal on behalf of California's independent insurance agents and brokers. We are committed to a fair and nonpartisan process and have sent identical questionnaires to both major candidates for California Insurance Commissioner in the November 2026 General Election.