

To Members of the Homeowners Market Data Call (C) Task Force:

[Ceres](#) and the Ceres [Accelerator for Sustainable Capital Markets](#) appreciate the opportunity to comment on the proposed revisions to the NAIC Homeowners Market Data Call template as presented in the August 6, 2025 Summary of Recommended Revisions by the Homeowners Market Data Call (C) Task Force. [Ceres](#) is a nonprofit advocacy organization with over 35 years of experience working to accelerate the transition to a cleaner, more just, and resilient economy. Our [Investor Network](#), [Company Network](#), and [Policy Network](#) includes many large US institutional investors and large companies with whom we work on a range of sustainability-related and policy-related issues.

The Ceres Accelerator for Sustainable Capital Markets aims to transform the practices and policies that govern capital markets by engaging federal and state regulators, financial institutions, investors, and corporate boards to address weather-driven risk as a systemic financial risk. The comments provided herein represent only the opinions of Ceres, and do not necessarily infer endorsement by each member of our Investor, Company, or Policy networks.

Executive Summary

Ceres supports the proposed revisions to the Homeowners Market Data Call template, particularly the new data fields that will enhance transparency around climate-related risks and resilience measures in the homeowner's insurance market. The addition of peril-specific loss data and comprehensive mitigation discount tracking represents meaningful progress toward better understanding climate impacts on insurance markets.

For too long, the insurance industry and regulators have lacked comprehensive, national standardized data on how specific climate perils are affecting homeowners' insurance markets. Without this information, stakeholders have been operating with incomplete pictures of risk concentration, loss trends, and market stability dynamics. The proposed revisions directly address this critical data gap in several meaningful ways.

1. Peril-Specific Claims and Loss Data

We strongly support the addition of separate data collection for:

- Fire and Lightning claims and losses
- Wind and Hail claims and losses
- Water Damage and Freezing claims and losses
- Wildfire claims and losses (as a distinct category)
- All Other Perils claims and losses

This disaggregation is critical for understanding climate risk trends. This peril-specific approach builds on data that is already submitted to statistical agents in accordance with the NAIC Statistical Handbook, ensuring consistency across regulatory reporting while providing new transparency to market participants. The specific inclusion of wildfire as a separate peril category is especially

valuable given increasing wildfire activity across many regions. This separate tracking will enable identification of emerging loss patterns that differ markedly from traditional structure fires.

The comprehensive nature of this peril-specific approach will enable more informed regulatory oversight of market stability in climate-vulnerable areas. When regulators can see precisely which perils are driving losses in specific geographic areas, they can better anticipate where market stress might emerge and take proactive steps to maintain insurance availability for consumers.

2. Comprehensive Mitigation Discount Data Collection

The addition of Part IV represents the first comprehensive, standardized collection of mitigation discount data across the industry, moving beyond anecdotal information to systemic tracking. This represents groundbreaking progress in understanding how insurance markets incentivize climate resilience as, for the first time, regulators and stakeholders will have comprehensive insight into how effectively insurance pricing encourages property owners to invest in climate adaptation measures. Beyond regulatory oversight, mitigation discount data is material for investors and lenders. Standardized reporting would show whether insurers are managing physical risks and pricing resilience effectively, aligning with TCFD expectations and strengthening market confidence in insurers' climate risk management.

We particularly commend these entirely new data collection requirements:

State-Mandated vs. Non-State Mandated Framework: This distinction will provide crucial evidence about the relative effectiveness of regulatory requirements versus voluntary market incentives, and in turn addresses fundamental policy questions about how best to drive resilience adoption at scale.

Granular Mitigation Categories: The breakdown into specific mitigation types is excellent:

- Fortified Standard discounts
- Wind mitigation discounts
- Fire/Wildfire mitigation discounts
- Impact/Hail mitigation discounts
- Water mitigation discounts

This information will prove invaluable for identifying market gaps where resilience isn't being adequately incentivized and for understanding which approaches most effectively encourage climate adaptation investments by property owners.

Dual Metrics (Count and Average Percentage): Collecting both the number of policies with discounts and average discount percentages will enable comprehensive analysis of both adoption rates and financial incentive levels.

3. Enhanced Policy Coverage Scope

The expansion to include HO-4 renters policies, HO-6 condominium coverage, HO-7 manufactured home policies, and other specialized forms significantly improves the comprehensiveness of market data. This broader coverage is particularly important for understanding climate vulnerability across different housing types and economic segments. Mobile homes, for instance, face heightened climate risks that often go unmeasured in traditional homeowners data, while renters insurance provides insights into personal property risks that complement dwelling coverage data.

4. Improved Cancellation Timing Data

The addition of granular tracking of company-initiated cancellation timing (0-59 days, 60-90 days, >90 days) along with written and returned premium data will provide valuable insight into market stability dynamics. This timing data becomes especially important during periods of increasing climate risk, when insurers may accelerate their underwriting and cancellation processes in response to emerging threats. The shift from house-months to point-in-time reporting (policies in force as of December 31) will significantly improve data consistency and comparability across companies and reporting periods. These methodology changes will both help standardize and streamline reporting, enhancing data quality and industry compliance.

Granular cancellation and nonrenewal data is also a consumer protection and market stability imperative. Sudden loss of coverage, especially for lower-income households and residents in climate-exposed regions, can leave families uninsured, uninsurable, and financially vulnerable. Data shows that insurers have non-renewed **more than 1.9 million** homeowners' policies between 2018 and 2023 nationwide. Without transparent, timely data, regulators cannot identify where consumers are most at risk of abrupt market withdrawal, nor can market participants, such as banks, mortgage companies, and investors, make informed decisions.

Recommendations for Maximizing Climate Risk Insights

While strongly supporting these proposed changes, Ceres emphasizes that the value of this enhanced data collection hinges entirely on robust public accessibility and transparency. Without annual public release in user-friendly formats, even the most comprehensive data collection will fail to achieve its intended impacts on climate risk understanding and market resilience.

In fact, the NAIC has a unique opportunity to lead globally: the Homeowners Data Call collects peril-level and cancellation/mitigation data that goes beyond what ISSB, IAIS, or **Solvency II** currently require for public disclosure. Making this information public would set a higher standard

for insurance transparency worldwide. By committing to annual public release of aggregated Homeowners Data Call results, NAIC would reinforce comparability, reduce information asymmetry, and demonstrate leadership consistent with global standards.

Ceres strongly recommends the NAIC commit to:

Mandatory Annual Public Release: Establish a firm commitment to publish aggregated results annually within six months of data collection. Data that remains internal to regulators cannot inform the critical decisions that market participants, researchers, policymakers, and communities need to make about climate risk.

Accessible Data Formats: Ensure data is released in multiple accessible formats including downloadable spreadsheets, interactive dashboards, and summary reports that serve different user needs, from academic researchers requiring granular data to community advocates needing clear trend summaries.

Comprehensive Transparency: Publish not just aggregate data totals but meaningful breakdowns by state, region, and peril type that enable stakeholders to understand localized climate risk patterns and market dynamics.

Future Iteration Considerations

Looking ahead, Ceres strongly supports the Task Force's consideration of collecting dwelling square footage data in future iterations. This metric would significantly enhance the analytical value of the peril-specific loss data by enabling proper normalization and exposure analysis.

Additional future enhancements could include geographic granularity below zip code level for high-risk climate areas, tracking of policy exclusions specifically related to climate perils, and analysis of seasonal patterns in claims data to understand climate timing effects.

Looking beyond the current proposal, Ceres strongly recommends that future iterations include data from state FAIR plans, with appropriate adjustments for state-specific data restrictions. FAIR plans represent critical climate risk information as they often serve as the "insurer of last resort" for properties that private markets deem too risky, frequently due to climate-related exposures such as wildfire, hurricane, or coastal flood risks. This data would provide essential insights into market retreat patterns from climate-vulnerable areas, taxpayer exposure to climate risks through state-backed insurance, and early warning indicators of insurance market stress. While recognizing the coordination challenges with individual state programs and varying confidentiality requirements, even aggregate FAIR plan data would provide valuable market intelligence for assessing climate-related systemic risks.

Implementation Support

Ceres supports the proposed timeline for data collection covering years 2018-2024, with potential inclusion of 2025 depending on implementation timing. This historical depth will be valuable for establishing baseline climate risk patterns and identifying trends that might otherwise be obscured by year-to-year variability.

Alignment with Climate Risk Transparency Needs

These data enhancements align well with growing demands for climate risk transparency from investors, regulators, and other stakeholders. The improved dataset will support:

- More robust climate-related risk disclosures by insurers
- Better informed assessment of insurance sector climate exposure
- Enhanced climate risk data for mortgage lending and real estate markets

The Critical Importance of Public Data Access

Ceres cannot overstate the importance of making this enhanced data publicly available on an annual basis. The collection of this valuable climate risk data will only achieve its full potential if it is systematically released to the public in accessible, analyzable formats. The NAIC must commit not just to collecting this data, but to ensuring it becomes a reliable, accessible public resource that stakeholders can depend upon for annual insights into climate risk trends in insurance markets.

Conclusion

These proposed revisions represent meaningful progress toward the data transparency needed to understand and manage climate risks in the homeowners insurance market. The addition of peril-specific loss data and comprehensive mitigation tracking will provide essential insights for market participants, regulators, and stakeholders working to build climate resilience.

As climate impacts accelerate and insurance markets face increasing stress, these data improvements become not just valuable but essential for maintaining market stability and protecting consumers. The climate crisis demands better data to support informed decision-making across all sectors of the economy. These revisions create critical infrastructure for understanding how climate risks flow through insurance markets and affect consumers, communities, and the broader financial system.

Ceres strongly supports adoption of these changes and encourages the Task Force to prioritize both implementation of the climate-related data fields and establishment of robust public access mechanisms. The transformative potential of this data can only be realized through systematic annual public release in accessible formats. We appreciate the opportunity to comment on these

important improvements and stand ready to support effective implementation that will benefit market participants, policyholders, and the broader socio-economic sphere through the transparency that enables informed climate risk decision-making.

Sincerely,

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