

**Testimony Submitted by  
Chris Coughlin, Policy Director  
Oregon Consumer Justice  
To the House Committee on Climate, Energy, and Environment**

April 5, 2023

Regarding: Support for SB 82

Chair Marsh, Vice-Chair Levy, Vice-Chair Levy, and Members of the  
Committee,

For the record, my name is Chris Coughlin, and I appreciate the  
opportunity to testify on behalf of Oregon Consumer Justice today in  
support of SB 82.

Oregon Consumer Justice (OCJ) organizes, advocates, and supports  
litigation to advance a justice movement that puts people first,  
ensuring all have the freedom to thrive and equitably share in our  
abundance of resources. For too long, flawed systems and economic  
policies that favor profits over people have stood in the way of this  
reality, with communities of color most often experiencing the most  
significant harm. Strengthened through responsive and reciprocal  
community relationships, OCJ is building a future where financial and  
business transactions can be relied upon as safe and where all  
Oregonians know and have recourse to exercise their consumer  
rights.

Many Oregonians are still dealing with the aftermath of the 2020 wildfires and the implications for their homeowner insurance policies. SB 82 will help provide increased clarity and transparency so consumers can make informed decisions, which is critical to a fair and equitable marketplace.

SB 82:

- Requires that an insurer that cancels, decides not to renew, or increases a premium for a homeowner insurance policy for a reason that is related to wildfire risk send a notice that includes:
  - Property-specific characteristics related to wildfire risk which resulted in the insurer's decision
  - Wildfire risk mitigation actions the insured can take to meaningfully reduce wildfire risk to improve the insurability of the property, including any possible discounts or other premium adjustments
  - General information about factors considered by the insurer to classify, measure, or otherwise determine the wildfire hazard risk to a property
  - If wildfire risk scores or classifications are used, insurers need to include the following:
    - A plain language description of how wildfire risk scores and classifications are determined, including a description of any general variables the insurer considers
    - The range of wildfire risk scores or classifications that could potentially be assigned to a property

- The relative position of the wildfire risk score or classification assigned to the property
- Impacts, if there are any, that wildfire risk mitigation actions could have on a wildfire risk score or classification assigned to the property
- Requires the insurer to make public and reflect in the insurer's underwriting guidelines and rate plans information related to wildfire risk mitigation actions
- Requires the insurer to allow the insured at least 24 months to repair, rebuild, or replace damaged or lost property if the damage or loss was directly related to a fire that was the subject of an order under the Emergency Conflagration Act
- Prohibits the insurer from using a wildfire risk map published by an Oregon state agency as the basis for canceling or declining insurance renewals.

We urge your support for SB 82. It will provide greater transparency for property owners regarding how insurance companies view wildfire risks on their property and how mitigation actions would affect their rates.

Thank you for your consideration and your service to Oregon's communities.