



## State of New Hampshire Insurance Department

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### **New Hampshire Insurance Department Urges Collaboration and Expresses Concerns Regarding Federal Insurance Office's Climate-Related Data Call Proposal**

**CONCORD, NH (November 28, 2023)** – The New Hampshire Insurance Department (NHID) has officially responded to the Federal Insurance Office's (FIO) request for comments on its initiative for a countrywide data call on writers of personal lines homeowners' coverage. In the letter addressed to the FIO, Commissioner Bettencourt expresses appreciation for the opportunity to comment while raising significant concerns about the proposed plan.

"While we share the Federal Insurance Office's commitment to understanding the impacts of climate change on homeowners, it is crucial that we harmonize our efforts," said New Hampshire Insurance Commissioner DJ Bettencourt. "Collaboration with state regulators through the National Association of Insurance Commissioners is key to avoiding duplication and ensuring a comprehensive understanding of the challenges faced by homeowners."

The Department's letter highlights concerns about potential duplicative efforts, as the FIO's proposed data call overlaps with ongoing initiatives by the NAIC and state regulators. The letter points out that the NAIC has been working diligently over the last six months to develop a targeted data call for the same purpose.

Additionally, the letter underscores the potential violation of the FIO's Duty to Coordinate, as outlined in 31 U.S.C. §313 (e) (4). The statute mandates coordination with the NAIC and state regulators before issuing a data call directly to insurers.

Furthermore, the letter addresses potential limitations in the FIO's sampling approach, estimating that only 54% of the New Hampshire homeowners' market would be included. This exclusion would overlook contributions from local and

regional carriers and raises specific concerns about the omission of certain types of homes, such as mobile homes. Owners of mobile homes in New Hampshire are primarily serviced by a few carriers not meeting the FIO's inclusion threshold, potentially leaving this vulnerable segment of the population out of the FIO's analysis.

Concerns are also raised about the FIO's approach to collecting both premium and loss data. The NHID suggests aligning loss data with earned premium for accurate analysis and focusing on premium and renewal trends, as discussed during NAIC-led preparations.

"Our goal is a robust, inclusive analysis that encompasses all aspects of our diverse insurance market, leaving no homeowner or type of home overlooked in our pursuit of effective climate-related solutions," concluded Commissioner Bettencourt.

### **The New Hampshire Insurance Department Can Help**

The New Hampshire Insurance Department's mission is to promote and protect the public good by ensuring the existence of a safe and competitive insurance marketplace through the development and enforcement of the insurance laws of the State of New Hampshire. Contact us with any questions or concerns you may have regarding your insurance coverage at 1-800- 852-3416 or (603) 271-2261, or by email at [consumerservices@ins.nh.gov](mailto:consumerservices@ins.nh.gov). For more information, visit <https://www.nh.gov/insurance>.

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