CONFIDENTIAL – TRADE SECRET PROTECTION REQUESTED

September 4, 2026

TK Keen
Commissioner of Insurance
Oregon Department of Consumer and Business Services
Division of Financial Regulation

RE: State Farm/Cotality Request to Maintain Cotality Technical Documentation U.S. Wildfire Model RQE V.22.1 as Confidential and Trade Secret
SERFF Tracking Number: LOCA-135080265

Dear Mr. Keen:

This request is submitted by State Farm/Cotality to maintain the confidentiality of the Cotality Technical Documentation U.S. Wildfire Model RQE V.22.1 Principles and Methodology Released: December 2025 ("Cotality Wildfire Model Principles and Methodology Documentation") which State Farm/Cotality is submitting with the required Confidentiality Index and Confidential marking as it applies to insurance filings in Oregon and under any Oregon statutes/regulations.

In particular, State Farm/Cotality respectfully request confidentiality and exemption from public disclosure for the wildfire model hazard, vulnerability, demand surge, and validation principles, methodologies, variable, and other details provided in the Cotality Wildfire Model Principles and Methodology Documentation which Cotality competitors could leverage to Cotality's commercial detriment if made available publicly including for example Cotality's wildfire risk model product competitors.

In further support, Cotality states that: a) the wildfire model hazard, vulnerability, demand surge, and validation principles, methodologies, variable, and other details provided in the Cotality Wildfire Model Principles and Methodology Documentation comprise sufficiently secret/confidential commercial information and details which derive independent economic value to Cotality, actual or potential, from not being generally known to and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use including for example and in particular Cotality's wildfire risk model competitors; and b) the Cotality Wildfire Model Principles and Methodology Documentation and the details therein have been the subject of Cotality efforts reasonable under the circumstances to maintain their secrecy.

Cotality additionally states as follows:

1. <u>This wildfire risk model documentation and the details included therein are not known outside of Cotality without confidentiality obligations and are not known to any of Cotality's competitors</u>.
   Cotality along with other wildfire risk model vendors, use modeling techniques

to assess wildfire risk. While the use of wildfire risk is commonplace in industry, the quality of data available, and the skill set and technical capabilities of Cotality staff results in models of vastly different sophistication and wildfire risk assessment capability. Cotality's combination of data is unique to Cotality and its research staff has independently achieved a high level of expertise in the development of details of Cotality's wildfire risk model including in particular the wildfire model hazard, vulnerability, demand surge, and validation principles, methodologies, and variable details provided in the Cotality Wildfire Model Principles and Methodology Documentation. The Cotality Wildfire Model Principles and Methodology Documentation is known and shared outside of Cotality only to customers subject to separate licensing and non-disclosure agreements and further subject to the confidentiality agreement on page 1 of the Cotality Wildfire Model Principles and Methodology Documentation and the proprietary designation on each page of the Cotality Wildfire Model Principles and Methodology Documentation. Moreover, the Cotality Wildfire Model Principles and Methodology Documentation is not available or known to any of Cotality's wildfire risk model competitors.

2. <u>The documentation and the data/information therein is known internally at Cotality on a need-to-know basis only</u>.
The Cotality Wildfire Model Principles and Methodology Documentation and more specifically the wildfire model hazard, vulnerability, demand surge, and validation principles, methodologies, and variable details included therein are closely held internally among a few carefully chosen individuals on a need-to-know basis only.

3. <u>Cotality has taken measures to guard the secrecy of the documentation and the data/information contained therein</u>.
Cotality maintains the Cotality Wildfire Model Principles and Methodology Documentation and the details therein confidentially, only sharing it subject to the highest degree of safeguarding available internally on a need-to-know basis and externally only to customers subject to confidentiality agreement as described in more detail above.

4. <u>The documentation and the data/information therein are of value to Cotality and its competitors</u>.
Cotality's sustainable competitive advantage will be jeopardized if Cotality is unable to protect the Cotality Wildfire Model Principles and Methodology Documentation and the details therein which are the product of Cotality's independent research and unique databases.

5. <u>Cotality has expended a considerable amount of effort to develop this documentation and the data/information included therein</u>.
Cotality has full time, dedicated Data Scientists on staff. Wildfire risk model development involves considerable cost, including dedicated staff salaries, IT support and staff participation from many other functional areas.