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October 17, 2005

***VIA HAND DELIVERY***

Alessandro A. Iuppa, Superintendent  
Attn: Vanessa J. Leon  
Docket No. INS-05-700  
Maine Bureau of Insurance  
34 State House Station  
Gardiner, Maine 04333-0034

In Re: Review of Aggregate Measurable Cost Savings Determined By Dirigo Health  
For the First Assessment Year

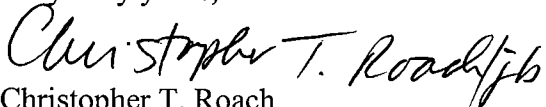
Dear Superintendent Iuppa:

Enclosed for filing please find two hard copies of the following:

SUBMITTED BY: Christopher T. Roach  
DATE: October 17, 2005  
DOCUMENT TITLE: Anthem BCBS Response to Informational Requests of Consumers  
for Affordable Health Care  
DOCUMENT TYPE: Response to Request for Information  
CONFIDENTIAL: **No**

Thank you for your assistance in this matter.

Very truly yours,

  
Christopher T. Roach

cc: John Kelly  
Thomas C. Sturtevant, Jr.

STATE OF MAINE  
DEPARTMENT OF PROFESSIONAL AND FINANCIAL REGULATION  
BUREAU OF INSURANCE

IN RE:	)	
	)	
REVIEW OF AGGREGATE	)	
MEASURABLE COST SAVINGS	)	<b>ANTHEM HEALTH PLANS</b>
DETERMINED BY DIRIGO HEALTH	)	<b>OF MAINE, INC. RESPONSE</b>
FOR THE FIRST ASSESSMENT YEAR	)	<b>TO INFORMATION</b>
	)	<b>REQUESTS OF CONSUMERS</b>
	)	<b>FOR AFFORDABLE</b>
	)	<b>HEALTH CARE</b>
	)	
	)	
Docket No. INS-05-700	)	

Pursuant to Maine Bureau of Insurance Rules chapter 350, section 10, Anthem Health Plans of Maine, Inc. d/b/a/ Anthem Blue Cross and Blue Shield (“Anthem BCBS”), by and through undersigned counsel, hereby respond to the Requests for Information of Consumers for Affordable Health Care.

1. Apart from whether or not attributable to Dirigo, do the Plans agree that the historical settlements reduce hospital costs in savings by \$96.4 million as calculated by Mercer as set forth in its September 19, 2005 Report (Tab 11 of the Board’s Filing) and if not, explain in detail:

- A. Why the Chamber<sup>1</sup> disagrees; and
- B. How the hospitals accounted for the settlements.

**Response:** Anthem BCBS objects to this request because it seeks measurable cost savings information that is not attributable to the operation of Dirigo and is therefore irrelevant to this proceeding as well as information about which Anthem BCBS does not have personal knowledge. Subject to and without waiving this objection, Anthem BCBS responds as follows:

A. Historical hospital settlements between the State and hospitals were

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<sup>1</sup> Anthem BCBS assumes that the reference to the Chamber is an error.

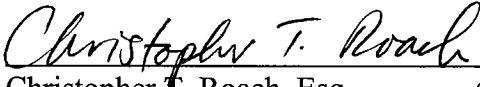
unrelated to the operations of Dirigo Health, as they reflected money that was legally owed to hospitals by the State for a lengthy period of time before Dirigo was ever contemplated.

B. Anthem BCBS is not privy to the specifics of how the hospitals have done this accounting and are therefore not in a position to answer this question.

2. Assuming the methodology is accepted, do the Plans agree with the analysis of the other Dirigo Initiatives by Mercer as set forth in its September 19, 2005 (Tab 11 of the Board's Filing) and if not, why not.

**Response:** Anthem BCBS objects to this request as overly broad, ambiguous, and vague in failing to articulate what is meant by the distinction between "the methodology" and "the analysis." Subject to and without waiving these objections, Anthem BCBS has already provided witness designations summarizing its views, which designation is incorporated herein by reference.

DATED: October 17, 2005

  
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*Attorney for*  
*Anthem Health Plans of Maine, Inc.*

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 17, 2005, a copy Anthem Health Plans of Maine, Inc.'s Response to Request for Information from Consumers for Affordable Health Care was served via electronic and US mail on each of the persons listed below:

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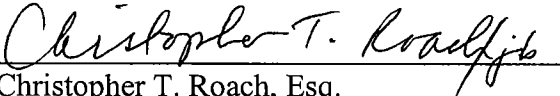
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DATED: October 17, 2005

  
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