

October 11, 2005

Via mail & email

Alessandro A. Iuppa, Superintendent
Attn: Vanessa J. Leon, Docket No. INS-05-700
Bureau of Insurance
Maine Department of Professional and Financial Regulation
34 State House Station
Augusta, Maine 04333-0034
vanessa.j.leon@maine.gov

Re: Review of Aggregate Measurable Cost Savings Determined by Dirigo Health for the First Assessment Year, Docket No. INS-05-700

Dear Superintendent Iuppa:

Please find enclosed the following:

1. Filing Cover Sheet.
2. Two hard copies of Dirigo Health Information Request to Maine Association of Health Plans.

Thank you for your assistance with this matter.

Yours very truly,

/s/William H. Laubenstein, III

William H. Laubenstein, III
Assistant Attorney General

cc: (Via mail and email)
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STATE OF MAINE
DEPARTMENT OF PROFESSIONAL AND FINANCIAL REGULATION
BUREAU OF INSURANCE

IN RE: REVIEW OF AGGREGATE)
 MEASURABLE COST SAVINGS)
 DETERMINED BY DIRIGO) FILING COVER SHEET
 HEALTH FOR THE FIRST)
 ASSESSMENT YEAR)
Docket No. INS-05-700)

TO: Alessandro Iuppa, Superintendent of Insurance
Attn: Vanessa J. Leon

Date Filed: October 11, 2005

Name of Party: Dirigo Health Board of Directors

Document Title: Dirigo Health Information Request to Maine Association of Health
 Plans

Document Type: First Request for Interrogatories

Confidential: No

Dated: October 11, 2005

Respectfully submitted,

/s/William H. Laubenstein, III

William H. Laubenstein, III
Assistant Attorney General

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

IN RE: REVIEW OF AGGREGATE)	DIRIGO HEALTH
MEASURABLE COST SAVINGS)	INFORMATION
DETERMINED BY DIRIGO)	REQUEST TO MAINE
HEALTH FOR THE FIRST)	ASSOCIATION OF
ASSESSMENT YEAR)	HEALTH PLANS
)	
Docket No. INS-05-700)	

The Board of Directors of Dirigo Health (the "Board"), pursuant to Bureau of Insurance Rules Chapter 350 (10) and the Superintendent's Procedural Order dated September 19, 2005 requests the Maine Association of Health Plans (the "Plans") respond to the following Information Requests.

1. Please identify by name, address and business or professional affiliation every person or entity involved in the Plans' development of questions set forth in its Informational Request to the Board date October 7, 2005.
2. Please identify, if not done so in response to Request No. 1, by name, address and business or professional affiliation every consultant or expert retained by the Plans with regard to the present proceeding.
3. For each person or entity identified in response to Request No. 2, please provide a copy of the contract or other agreement pursuant to which services were retained.
4. For each person or entity identified in response to Request No. 2, please state the rate of compensation and how much has been paid to date to each person.
5. Please provide a copy of all reports prepared for this proceeding or related to the determination of aggregate measurable cost savings by each person identified in response

to Request No. 2, whether or not such reports are to be introduced into evidence in this proceeding.

6. If the Plans intend to present an alternative methodology to the methodology adopted by the Board, please describe the alternative methodology in detail.
7. If your response to Request No. 6 was "yes", please provide all data, calculations, information, work papers, documents and other materials of whatever kind and nature related to the methodology and your determination of aggregate measurable cost savings.
8. With regard to your response to Request No. 7, please identify the sources of all data used.
9. If not already provided in response to Request No. 6 or question No. 5, please provide a copy of all reports prepared or related to the alternative methodology, whether or not such reports are to be introduced into evidence in this proceeding.
10. If the Plans contend that there have been increased costs in the health care system as a result of the operation of Dirigo Health, please:
 - a. Identify each cost
 - b. State the amount of each cost identified
 - c. State how each cost identified is the result of the operation of Dirigo Health
 - d. Provide all data, calculations, information, work papers, documents and other materials of whatever kind and nature used in developing each cost identified
11. If the Plans contend that there are savings in the health care system not the result of the operation of Dirigo Health, please:
 - a. Identify each savings
 - b. State the amount of each saving identified