

Verrill Dana_{LLP}

Attorneys at Law

WILLIAM H. STILES
PARTNER
wstiles@verrilldana.com
Direct: 207-253-4966

ONE PORTLAND SQUARE
PORTLAND, MAINE 04112-0586
207-774-4000 • FAX 207-774-7499
www.verrilldana.com

October 17, 2005

By E-mail and U.S. Mail

Alessandro A. Iuppa, Superintendent
Attn: Vanessa J. Leon, Docket No. INS-05-700
Bureau of Insurance
Maine Department of Professional & Financial Regulation
124 Northern Avenue
Gardiner, Maine 04345

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

Dear Superintendent Iuppa:

Enclosed for filing in the above-referenced matter please find the original and one (1) copy of the following documents:

1. Filing Cover Sheet; and
2. Maine State Chamber of Commerce Request for an Extension to Respond to the Information Request Propounded by Consumers for Affordable Health Care.

Thank you for your attention to this matter.

Very truly yours,



William H. Stiles

WHS/rdl
Enclosure

cc: Service List (*by e-mail*)
John Kelly (*by e-mail and U.S. Mail*)
Kristine Ossenfort

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**

Dated Filed: October 17, 2005

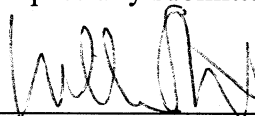
Name of Party: Maine State Chamber of Commerce

Document Title Request for an Extension to Respond to Information Request Propounded
by Consumers for Affordable Health Care

Document Type: Request for Extension

Confidential: No

Respectfully submitted,



William H. Stiles, Bar No. 8123

VERRILL DANA, LLP
P.O. Box 586
One Portland Square
Portland, Maine 04112-0586
William H. Stiles Direct: (207) 253-4658
Email: wstiles@verrilldana.com
cc: rlefay@verrilldana.com

Phone: (207) 774-4000
Fax: (207) 774-7499

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

| | | |
|-------------------------------|---|----------------------------|
| IN RE: |) | |
| |) | |
| REVIEW OF AGGREGATE |) | |
| MEASURABLE COST SAVINGS |) | |
| DETERMINED BY DIRIGO HEALTH |) | MAINE STATE CHAMBER |
| FOR THE FIRST ASSESSMENT YEAR |) | OF COMMERCE REQUEST |
| |) | FOR AN EXTENSION TO |
| |) | RESPOND TO THE |
| |) | INFORMATION REQUEST |
| |) | PROPOUNDED BY |
| |) | CONSUMERS FOR |
| Docket No. INS-05-700 |) | AFFORDABLE HEALTH |
| |) | CARE |

The Maine State Chamber of Commerce (the “Chamber”), pursuant to Bureau of Insurance Rule Chapter 350 and the Superintendent’s Procedural Order dated September 19, 2005, hereby respectfully requests an extension to respond to the Information Request Propounded by the Consumers for Affordable Health Care (the “Consumers”).

The Consumers served the Chamber with an information request on October 11, 2005. Pursuant to the Superintendent’s Procedural Order, the Chamber’s response would be due October 16, 2005. Some of the Consumer’s requests are duplicative of information requests by Dirigo to the Chamber. The Chamber is working diligently to respond to Dirigo’s information requests, which are due October 18, 2005.¹ Therefore, the Chamber requests an extension of time to respond to the information request from the Consumers; specifically, to 5:00 p.m., October 19, 2005.

¹ Pursuant to the Superintendent’s Order dated October 14, 2005, the Chamber has until 3:00 p.m., October 18 to respond to Dirigo’s requests that were not objected to, and to 5:00 p.m., October 19 to respond to requests that were objected to.

Counsel for the Consumers has been contacted and does not object to the Chamber's request for an extension. In addition, the Consumers agree to withdraw and/or modify certain discovery requests as set forth below.

The following requests by the Consumers are duplicative of certain requests by Dirigo to the Chamber:

Consumer Request Nos. 1 through 3: The Consumers agree to withdraw these requests to the extent they are duplicative of Dirigo requests 35 through 37. The Chamber will cross reference to its responses to Dirigo.

Consumer Request Nos. 9 and 10: The Consumers agree to withdraw these questions because they are duplicative of Dirigo's Request Nos. 20 and 21. The Chamber will cross reference to its responses to Dirigo.

Consumer Request No. 11: The Consumers agreed to withdraw this question.

Consumer Request No. 12: The Consumers agreed to modify **Request No. 12** as follows:

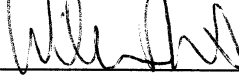
The Consumers request the Chamber to describe generally the contracting process for the major hospitals and major payors, to the extent the Chamber has knowledge of this information.

WHEREFORE, the Chamber requests the Superintendent to grant the following relief:

The Chamber's time to respond to the Consumer's Request is extended until 5:00 p.m., October 19, 2005.

Dated: October 17, 2005

Respectfully submitted,



William H. Stiles, Lead Attorney
Beth Dobson, Co-Counsel
Brett D. Witham, Co-Counsel
Counsel for the Maine State Chamber
of Commerce

VERRILL DANA, LLP
P.O. Box 586
One Portland Square
Portland, Maine 04112-0586
William H. Stiles Direct: (207) 253-4658
Email: wstiles@verrilldana.com
cc: rlefay@verrilldana.com
Phone: (207) 774-4000
Fax: (207) 774-7499

CERTIFICATE OF SERVICE

I, William H. Stiles, attorney for the Maine State Chamber of Commerce, hereby certify that on this day the foregoing document was served on the following parties via first-class mail and electronic mail:

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

William H. Laubenstein, III, Esq. Office of the Attorney General
6 State House Station
Augusta, ME 04333-0006
bill.laubenstein@maine.gov
Counsel for Dirigo Health Agency

Thomas C. Sturtevant, Jr.
Assistant Attorney General
Office of the Attorney General
6 State House Station
Augusta, Maine 04333-0006
Tom.Sturtevant@maine.gov

Compass Health Analytics, Inc.
Attn: John Kelly
465 Congress Street, 7th Floor
Portland, Maine 04101
jck@compass-inc.com

I, William H. Stiles, attorney for the Maine State Chamber of Commerce, hereby certify that on this day the foregoing document was served on the following parties via and electronic mail only, as follows:

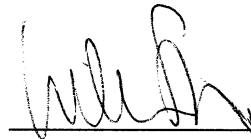
Christopher T. Roach, Esq.
Pierce Atwood, LLP
One Monument Square
Portland, ME 04101
croach@pierceatwood.Com
Counsel for Anthem Health Plans of Maine, Inc.

Rufus E. Brown, Esq.
Brown & Burke 85 Exchange Street,
Suite 201
P.O. Box 7530
Portland, ME 04112
rbrown@brownburkelaw.com
Counsel for Consumers for Affordable Health Care

D. Michael Frink, Esq.
Curtis, Thaxter, Stevens, Broder & Micoeau, LLC
One Canal Plaza
P.O. Box 7320
Portland, ME 04112-7320
dfrink@curtisthaxter.com
Counsel for Maine Association of Health Plans

Roy T. Pierce, Esq.
Preti Flaherty Beliveau Pachios & Haley, LLP
45 Memorial Circle
PO Box 1058
Augusta, Maine 04332-1058
rpierce@preti.com

Dated: October 18, 2018



William H. Stiles, Bar No. 8123