

June 15, 2016

Noel Hudson, Esq.
Health Policy Director
Green Mountain Care Board
89 Main Street, Third Floor
Montpelier, VT 05620



Re: MVP Health Care 2017 Vermont Health Connect
Rate Filing – Docket No. GMCB-007-16rr

Dear Hearing Officer Hudson:

MVP Health Plan, Inc. (“MVP”) respectfully objects to Questions 11 and 12 of the Suggested Questions filed by the Office of the Health Care Advocate on June 10, 2016, pursuant to Rule 2.000 §2.202(c). Rule §2.202(c) allows for rate request related questions, not fishing expeditions by the Health Care Advocate into non-relevant business and charitable activities of MVP. Specifically, MVP objects to Questions 11 and 12 as follows:

Question 11: Please explain how MVP Health Plan’s business practices as a nonprofit differ from MVP Health Insurance Company and how those differences impact premiums.

MVP Objection: MVP objects to Question 11 as vague, overbroad, and therefore unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence that is relevant to the statutorily defined inquiry in this matter. This question about corporate business practices does not appear to have anything to do with the rate request.

Question 12: Please describe your quality improvement initiatives, wellness benefits, and charitable giving and the costs associated with each activity within those categories.

MVP Objection: MVP objects to the use of the term “charitable giving” in Question 12 as vague, overbroad, and therefore unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence that is relevant to the statutorily defined inquiry in this matter. Whether MVP sponsors a Vermont charity or a Schenectady, New York little league team does not appear relevant to the Vermont rate filing.

Respectfully submitted,

Gary F. Karnedy

cc: Judith Henkin, Esq.
Lila Richardson, Esq.
Kaili Kuiper, Esq.

STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD

In re:)
MVP Vermont Health Connect)
2017 Rate filing) GMCB-07-16-rr
)
SERFF No. MVPH-130558905)

CERTIFICATE OF SERVICE

Now comes the undersigned and hereby certifies that a copy of *MVP Insurance Company's Objections to Suggested Questions filed by the Office of the Health Care Advocate* was served via U.S. Mail, postage prepaid, upon the following:

Lila Richardson
Staff Attorney
Office of the Health Care Advocate
P.O. Box 606
Montpelier, VT 05601

Kaili Kuiper
Vermont Legal Aid, Inc.
7 Court Street
P.O. Box 606
Montpelier, VT 05601-0606

Judith Henkin, Esq.
Green Mountain Care Board
89 Main Street, Third Floor
Montpelier, VT 05620

Dated: June 15, 2016

PRIMMER PIPER EGGLESTON &
CRAMER PC

By: _____

Gary F. Karnedy, Esq.
Primmer Piper Eggleston & Cramer PC
150 South Champlain Street
P.O. Box 1489
Burlington, VT 05602-1489
(802) 864-0880

*Attorneys for MVP Health Insurance
Company*