



BlueCross BlueShield of Vermont

An Independent Licensee of the Blue Cross and Blue Shield Association.

May 30, 2018

Judith Henkin, General Counsel
Green Mountain Care Board
Montpelier, VT 05620-3101

Re: HCA Expert Disclosures (BCBSVT 2019 Individual and Small Group Rate filing,
GMCB Docket 9-18-rr)

Dear Judy:

I write on behalf of Blue Cross and Blue Shield of Vermont (BCBSVT) in connection with the above referenced rate filing docket. The Office of Health Care Advocate (HCA) indicated at the pre-filing conference that it may call a witness at hearing but did not provide any information as to the identity of such witness or whether it will seek to have the person qualified as an expert. We anticipate that the identity (and any professional qualification) of such witness will be disclosed on or before June 4, 2018. As I stated at the pre-filing conference, without knowing whether the HCA will actually call a witness or whether it will seek to have the witness, if any, qualified as an expert, we may need to ask for additional time to determine whether a rebuttal witness is necessary.

As in past years, we ask the Board to order the HCA to produce the following information in connection with each witness and/or expert whose testimony the HCA intends to offer at hearing in its June 4 disclosure:

1. Disclosure of a current *Curriculum Vitae* for the HCA's expert;
2. If not included in the CV, disclosure of each professional engagement of the HCA's expert, including as an expert witness, for the last four years, including the forum and date of any testimony; and
3. Disclosure of the source and amount of the HCA's expert compensation for review and testimony on the filing.

In order to be ready for hearing on July 23, we ask that the following disclosures be made no later than July 2, 2018.

4. A copy of HCA's expert's opinion (including a recitation of all facts and opinions to which the expert is expected to testify as well as the basis for each opinion);
5. Copies of all documents and information relied on in formulating the expert's statement of facts and opinion.

Thank you for your attention to these requests.

Sincerely,



Jacqueline A. Hughes

cc: Kaili Kuiper, Esq.
Eric Schultheis, Esq.
Sebastian Arduengo, Esq.
Jay Angoff, Esq.
Agatha Kessler