STATE OF VERMONT GREEN MOUNTAIN CARE BOARD

In re: BlueCross and BlueShield Vermont)
2014 Benefit Relativity Filing) GMCB-02-14-rr
2014 Charge Factors for Aggregate Stop Loss, Risk & Administration Charges) GMCB-04-14-rr
2014 Large Claims and Stop Loss,) GMCB-06-14-rr

Blue Cross and Blue Shield of Vermont's Memorandum in Lieu of Hearings

Blue Cross and Blue Shield of Vermont (BCBSVT) requests the Green Mountain Care Board (GMCB) adopt the recommendations of its actuaries, Lewis and Ellis (L&E), and the Department of Financial Regulation (DFR) to approve the filings as filed in the above captioned dockets. Each of the filings is a "factor" filing used to determine the rates of experience rated large groups. L&E has opined that each of the filings does not produce rates that are excessive, inadequate, or unfairly discriminatory. Further, DFR has opined that the factors used in the filings as filed will not impact its assessment of BCBSVT's solvency and will support the maintenance of surplus targets for BCBSVT that DFR deems reasonable and necessary.

Both experts' opinions are unanimous in their recommendations for approval of the filings as filed. Given these recommendations and the fact that there is no basis in the record to modify them, we request the Board approve them as filed. This will help ensure that BCBSVT will have sufficient resources to pay claims. It will also help ensure that distortion among participants in the large group market, of which there are more than 33,000 covered by the filing, is kept to a minimum as well as even-handed treatment among market segments.

Dated at Montpelier, Vermont, this 28th day of March, 2014.

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CERTIFICATE OF SERVICE

I hereby certify that a Notice of Appearance has been duly served upon Michael Donofrio, General Counsel to the Green Mountain Care Board, and Lila Richardson, Office of Vermont Ombudsman, by electronic mail, return receipt requested, this 28th day of March, 2014.

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