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 Christopher H. Davis, F.S.A.  
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 Jill J. Humes, F.S.A.  
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 Naomi J. Kloepersmith, F.S.A.  
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David A. Palmer, C.F.E.

March 29, 2017

Jude Daye, Executive Assistant  
 Blue Cross and Blue Shield of Vermont  
 445 Industrial Lane  
 Montpelier, VT 05601

Re: Blue Cross and Blue Shield of Vermont  
 3Q 2017 LG Rating Program Filing  
 SERFF Tracking #: BCVT-130935599

Dear Jude Daye:

We have been retained by the Green Mountain Care Board (“GMCB”) to review the above referenced group products filing submitted on 2/23/2017. The following additional information is required for this filing.

Notice regarding proper responses:

- A minimum-acceptable response to quantitative questions from us must include a spreadsheet calculation with retained formulas such that we can replicate the calculations therein.
- Explanatory responses are merely a supplement to the spreadsheet material and in of themselves will constitute a lack of response.

Questions:

1. Please provide qualitative support for the projection ratio on the Details of Other worksheets in the proprietary response. This should include additional details regarding the Expected Allowed PPO Trend June 17.
2. Please provide the percentage change in administrative costs for all lines of business combined.
3. What is the impact of the billback expenses on the administrative trend in this filing?
4. Please reconcile the difference in the percent change in the manual claims and experience claims in the response to question #2 in the letter dated March 7, 2017.

5. How does the utilization of Orkambi for all lines of business compare to the utilization for large groups and the projected utilization in 2018?
6. If the taxes and fees associated with the Affordable Care Act are repealed, please describe how this will impact the groups in this filing and whether these changes would be expected to be filed.

Please be aware that we expect to have further questions regarding the filing as the review continues.

To ensure that the review of your filing has been completed before statutory deadlines, we expect you to respond as expeditiously as possible to every objection in our letter, but no later than March 30, 2017. Note that the responses can be submitted separately and do not have to be submitted all at the same time.

We trust that you understand these forms may not be used in Vermont until they are formally approved by the GMCB.

Sincerely,



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