



July 24, 2019

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
2020 Vermont Individual and Small Group Rate Filing
SERFF Tracking #: BCVT-131936226

Dear Jude Daye:

Thank you for your responses to our previous inquiry. We have the following additional questions regarding this filing:

Questions:

1. Please demonstrate that implementing L&E's recommendations regarding risk adjustment and the 0.2% adjustment relating to terminating groups results in a 1.3% rate decrease as stated in exhibits produced by BCBSVT at the recent hearing.
2. Please clarify how the 0.4% rate adjustment related to newborns referenced at the recent hearing relates to the 1.0059 impact described in objection response 15 provided on June 7th.

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 July 26, 2019. 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,

Kevin Ruggeberg, ASA, MAAA
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