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VIA EMAIL

Michael Barber, Esq.
General Counsel
Green Mountain Care Board
144 State Street
Montpelier, VT 05602
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RE: MVP Health Plan, Inc. 2024 Small Group and Individual
Rate Filings – Docket Nos. GMCB-004-23rr and GMCB-005-23rr

Dear General Counsel Barber:

We are writing in response to Blue Cross Blue Shield's June 29, 2023 letter to you regarding the Board's Guidance on Silver Loading ("Guidance"). *March 15, 2023 Guidance on Silver Loading*.

MVP and Blue Cross VT both followed the Guidance issued by the Board. In implementing the Guidance, MVP's goal was to best reflect our expectation of the future. MVP's membership movement assumption was determined based on the resulting premium relativities and historical migration of silver members. The supporting data was provided to and reviewed by L&E.

In their letter, Blue Cross states:

The impact of the guidance, however, is the same for both carriers' plans; there is no reason to assume Blue Cross VT members will behave differently from MVP members with similar silver loads.

In the separate dockets, Blue Cross VT and MVP actuaries each made their own assumptions, presumably both based in data, and they happen to be different. There are many assumptions in a rate filing which are not standardized. This is a difference in actuarial opinion that is justified and supported by our data. In addition, the rate review process for MVP should be performed independently of all other rate filings. *See 8 V.S.A. § 4062(a)(3)*. Blue Cross is certainly entitled to propose its actuarial opinions in its rate filings, however, it is not a party to the MVP docket. I am sure it was not Blue Cross's intent to request a ruling in the MVP docket. However, the Board should disregard any ex parte proffer of evidence or injection of opinions into the MVP docket by a non-party.

Respectfully submitted,

/s/ Gary Karnedy

Gary Karnedy, Esq.

cc: **(VIA EMAIL ONLY)**

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