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October 26, 2005

***By E-mail and U.S. Mail***

Alessandro A. Iuppa, Superintendent  
Attn: Vanessa J. Leon, Docket No. INS-05-700  
Bureau of Insurance  
Maine Department of Professional & Financial Regulation  
124 Northern Avenue  
Gardiner, Maine 04345

**Re: In Re: Review of Aggregate Measurable Cost Savings Determined by Dirigo  
Health for the First Assessment Year  
Docket No. INS-05-700**

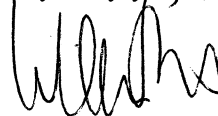
Dear Superintendent Iuppa:

Enclosed for filing in the above-referenced matter please find the original and one (1) copy of the following documents:

1. Filing Cover Sheet; and
2. Maine State Chamber of Commerce Motion to Admit Discovery Responses with Incorporated Memorandum of Law.

Thank you for your attention to this matter.

Very truly yours,



William H. Stiles

WHS/rdl  
Enclosure  
cc: Service List

STATE OF MAINE  
DEPARTMENT OF PROFESSIONAL AND FINANCIAL REGULATION  
BUREAU OF INSURANCE

IN RE: REVIEW OF AGGREGATE )  
MEASURABLE COST SAVINGS )  
DETERMINED BY DIRIGO ) FILING COVER SHEET  
HEALTH FOR THE FIRST )  
ASSESSMENT YEAR )

DOCKET NO. INS-05-700

**To: Alessandro Iuppa, Superintendent of Insurance**  
**Attn: Vanessa J. Leon**

Dated Filed: October 26, 2005

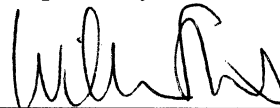
Name of Party: Maine State Chamber of Commerce

Document Title: Maine State Chamber of Commerce Motion to Admit Discovery  
Responses with Incorporated Memorandum of Law

Document Type: Motion

Confidential: No

Respectfully submitted,



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STATE OF MAINE  
DEPARTMENT OF PROFESSIONAL AND FINANCIAL REGULATION  
BUREAU OF INSURANCE

IN RE:	)	
	)	
REVIEW OF AGGREGATE	)	
MEASURABLE COST SAVINGS	)	
DETERMINED BY DIRIGO HEALTH	)	<b>MAINE STATE CHAMBER OF</b>
FOR THE FIRST ASSESSMENT YEAR	)	<b>COMMERCE MOTION TO</b>
	)	<b>ADMIT DISCOVERY</b>
	)	<b>RESPONSES WITH</b>
	)	<b>INCORPORATED</b>
	)	<b>MEMORANDUM OF LAW</b>
	)	
Docket No. INS-05-700	)	

NOW COMES Intervenor, the Maine State Chamber of Commerce (the “Chamber”), by and through its attorneys, and moves to admit certain discovery responses into the record of the hearing.

Information requests and responses were required to be filed on all parties, including the Superintendent. The Chamber understands that, according to Bureau of Insurance Rule Chapter 350, responsive material does not become part of the record of hearing unless offered and admitted. When this issue was raised at hearing on Monday, October 24, the Superintendent advised parties to move for the admission of responses to information requests. Therefore, the Chamber respectfully requests the following information requests and responses be made a part of the hearing record:

- (1) Dirigo Health Response to First Information Request of the Superintendent Nos. 1 and 2, including all subparts and documentation attached thereto in the form of CD’s and excel spreadsheets referenced in Attachment A to the responses;

(2) Dirigo Health Response to First Information Request of the Superintendent No. 3, subpart G;

(3) Dirigo Health Revised Response to Second Information Request of the Superintendent Nos. 1, 2 (including Attachment #1 and #2), 3, 4, 7 (including attachment #3), 9, 10, 14, 17 (including Attachment #4), and including all subparts;

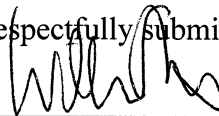
(4) Dirigo Health Response to Maine State Chamber of Commerce First Request for Information to the Board of Directors of Dirigo Health Nos. 1, 4 (including Dirigo response to the Trusts' request No. 36 with attachments), 5 (including Dirigo response to the Trusts' request No. 7, all subparts and attachments), 6 (including Dirigo response to the Trusts' request No. 52 with attachments), 7 (including Dirigo response to the Trusts' request No. 65 with attachments), 8, 9 (including Dirigo response to joint information requests from Anthem and MAHP Nos. 4 and 14), 10, 11, 16, 17, 18, 19, 20, 22, 23, 24, 25, 30, 43, 51, and 52 (including Dirigo response to the Trusts' request No. 7, all subparts and attachments).

The above information requests and responses are relevant to the Board's determination of aggregate measurable cost savings, and therefore relevant to the Superintendent's determination. Further, this information has been cited in briefs and has been, or will be, testified to at hearing, and therefore should be part of the record. In lieu of reading individual requests and responses and offering in the record at hearing, and in the interest of furthering a just, speedy and economic determination of this matter, the Chamber makes this motion in writing, and refers to individual requests and responses above.

WHEREFORE, the Chamber respectfully requests that the Superintendent grant this Motion, and for such other and further relief as justice may require.

Dated: October 26, 2005

Respectfully submitted,



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William H. Stiles, Lead Attorney  
Beth Dobson, Co-Counsel  
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of Commerce

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## CERTIFICATE OF SERVICE

I, William H. Stiles, attorney for the Maine State Chamber of Commerce, hereby certify that on this day the foregoing document was served on the following parties via first-class mail and electronic mail:

Alessandro A. Iuppa, Superintendent  
Attn: Vanessa J. Leon, Docket No. INS-05-700  
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I, William H. Stiles, attorney for the Maine State Chamber of Commerce, hereby certify that on this day the foregoing document was served on the following parties via and electronic mail only, as follows:

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Dated: *October 26, 2001*



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William H. Stiles, Bar No. 8123