BEFORE THE INSURANCE DEPARTMENT OF THE COMMONWEALTH OF PENNSYLVANIA

Statement Regarding the Acquisition of Control of or Merger with Domestic Insurers:

Highmark Inc.; First Priority Life Insurance Company, Inc.;
Gateway Health Plan, Inc.; Highmark Casualty Insurance Company;
Highmark Senior Resources Inc.; HM Casualty Insurance Company;
HM Health Insurance Company, d/b/a Highmark Health Insurance Company;
HM Life Insurance Company; HMO of Northeastern Pennsylvania, Inc.,
d/b/a First Priority Health; Inter-County Health Plan, Inc.;
Inter-County Hospitalization Plan, Inc.; Keystone Health Plan West, Inc.;
United Concordia Companies, Inc.; United Concordia Dental Plans of Pennsylvania, Inc.;
United Concordia Life and Health Insurance Company

By UPE, a Pennsylvania nonprofit corporation

RESPONSE TO SUPPLEMENTAL REQUEST 4.6.16.1 FROM THE PENNSYLVANIA INSURANCE DEPARTMENT

SUPPLEMENTAL REQUEST 4.6.16.1 (via letter from PID dated September 26, 2012):

Has the investment plan of any UPE Entity changed (or will the investment plan of any UPE entity change) as a result of implementation of the Supplemented Transaction? If so, describe how any such investment plan has or will change.

RESPONSE:

The investment plans of each of Highmark, UPE, UPE Provider Sub and any Highmark Affiliate have not (and will not) change as a result of implementation of the Supplemented Transaction.

UPE 120 Fifth Avenue Pittsburgh, PA 15222