

**BEFORE THE INSURANCE DEPARTMENT  
OF THE  
COMMONWEALTH OF PENNSYLVANIA**

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

**Hospital Service Association of Northeastern Pennsylvania  
d/b/a Blue Cross of Northeastern Pennsylvania;  
First Priority Life Insurance Company, Inc.;  
HMO of Northeastern Pennsylvania, Inc.,  
d/b/a First Priority Health**

**By Highmark Inc.**

**BCNEPA RESPONSE TO SUPPLEMENTAL INFORMATION REQUEST  
I.A.(1) FROM  
THE PENNSYLVANIA INSURANCE DEPARTMENT**

**SUPPLEMENTAL REQUEST I.A.(1) (via letter from PID dated August 27, 2014)**

**REQUIRED ACTION:** The following responses require a certification from BCNEPA that it has provided a response based upon all information available to it: 2.1.5, 2.1.8, 2.1.9, 2.1.10, 2.1.12, 2.3.3, 2.4.3, 2.4.5, 2.4.6, 2.6.6, 3.1, 3.3, 3.4, 4.4.1, 5.1, 5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.7, 5.2.9.2(D), 5.2.9.3(B), 5.2.9.3(E), 5.2.11.9, 5.2.14.2, 5.2.14.3, 5.2.14.4, 5.2.15, 5.2.16, 5.2.17.1, 5.2.17.2, 5.2.18.12.1, 5.3.1, 5.3.4(A), 5.3.4(D), 5.3.5, 5.3.5.1, 5.3.5.4, 5.3.5.5, 5.3.9, 5.4, 5.4.2.1, 5.4.4, 5.4.7, 5.4.7.2, 5.4.8.2, 5.4.8.3, 5.4.8.4, 5.6, 5.6.4, 5.6.8.1, 5.6.8.2, 5.6.11, 5.6.12, 5.6.15, 6.1.1.1, 6.1.1.2, 6.1.1.3, 6.1.1.4, 6.1.1.8, 6.1.1.10, 6.1.1.12, 6.1.1.14, 6.2.1, and 6.2.2.1.

**RESPONSE:**

BCNEPA hereby supplements its prior response to this Request.

BCNEPA certifies to the best of its knowledge, information and belief as follows:

BCNEPA's responses to the Requests listed below were provided based upon a good faith and diligent review of the information reasonably available to BCNEPA:

2.1.8, 2.3.3, 2.6.6, 4.4.1, 5.2.9.2(D), 5.2.9.3(B), 5.2.9.3(E), 5.2.14.2, 5.2.14.3, 5.2.15, 5.2.17.1, 5.2.17.2, 5.3.4(A), 5.3.4(D), 5.3.5, 5.3.5.1, 5.4, 5.4.2.1, 5.4.4, 5.4.7, 5.4.7.2, 5.4.8.2, 5.4.8.3, 5.4.8.4, 5.6, 5.6.4, 5.6.11, 6.1.1.1, 6.1.1.2, 6.1.1.3, 6.1.1.4, 6.1.1.8

BCNEPA indicated in its response to each of the Requests listed below that it interpreted the Request as being directed to Highmark and that, therefore, BCNEPA would not be providing a substantive response:

2.15, 2.1.9, 2.1.10, 2.1.12, 2.4.5, 2.4.6, 3.1, 3.3, 3.4, 5.1, 5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.7, 5.2.14.4, 5.2.16, 5.2.18.12.1, 5.3.1, 5.3.5.4, 5.3.5.5, 5.3.9, 5.6.8.1, 5.6.8.2, 5.6.12, 5.6.15, 6.1.1.10, 6.1.1.12, 6.1.1.14, 6.2.1, 6.2.2.1

BCNEPA is not aware of any information that is reasonably responsive to these Requests other than the information previously provided by Highmark; provided, however, that the substantive parts of Highmark's response to Request 2.4.5 and Highmark's supplemental response to Request 5.6.12 were not made available to BCNEPA and, therefore, BCNEPA is not able to make any certification with respect to Highmark's responses thereto. BCNEPA will separately supplement its responses to Requests 2.4.5 and 5.6.12 with any such reasonably responsive information as it may identify upon further good faith and diligent review of such information as is reasonably available to it.

**Hospital Service Association of  
Northeastern Pennsylvania  
d/b/a Blue Cross of Northeastern  
Pennsylvania ("BCNEPA")  
19 North Main Street  
Wilkes-Barre, PA 18711**