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October 28, 2015

Thomas C. Sturtevant, Esq.
Assistant Attorney General
Office of the Attorney General
6 State House Station
Augusta, Maine 04333-006

RE: Confidentiality/INS-15-1001

Dear Tom:

Progressive objects to the Advocacy Panel's October 28, 2015 motion regarding confidentiality to the extent it seeks to make public the rate filing that is the subject of this appeal, and rate filing's supporting data. Progressive views and is treating all documents, exhibits, and other data or information produced or introduced in this proceeding as rate filing "supporting data" which is "confidential until the filing is approved." 24-A M.R.S. §2304-A(9). We understood this to be the position of the Hearing Panel and Advocacy Panel as well, based on discussions during the telephonic scheduling conference held last month. The language of the statute and the common understanding of all participants in that conference is why we limited our request for confidentiality to "all materials in this filing and appeal" rather than requesting that the appeal itself and hearing be private.

Because Progressive has been and will continue to file in support of its appeal documents and exhibits which contain confidential supporting data under the assumption that these documents are and will be treated as confidential, I ask that the Hearing Panel issue a written decision confirming that all such items are confidential under 24-A M.R.S. §2304-A(9).

Sincerely,



Matthew S. Warner

MSW:smw

cc: James M. Bowie, Esq.