

The Commission's denial of DR21-72 increases the State, the Commissioners and the administrative office of the LUC's liability exposure.

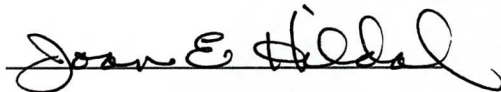
APPLICABLE LEGAL AUTHORITIES are described in the Petition and this Motion for Reconsideration but HRS 205-4 (h) has been added in this Memorandum.

By applying their signatures below the Petitioners certify that their statements herein are true to the best of their ability and that the Exhibits that are supplied herein also are true and reasonable representations of the original documents, however text boxes underlining and lines and notes etc. have been sometimes added which are displayed in a very obvious way. Such additions are not intended to mislead the Commissioners.

DATED: Hakalau, Hawaii, March 9, 2022.



Kenneth S. Church



Joan E. Hildal