

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company	)	<b>File No. GR-2019-0077</b>
d/b/a Ameren Missouri's Tariffs to Increase	)	Tracking Nos. YG-2019-0112
Its Revenues for Natural Gas Service	)	YG-2019-0113

**APPLICATION TO INTERVENE  
OF THE NATIONAL HOUSING TRUST**

COMES NOW the National Housing Trust ("NHT"), pursuant to the Commission's December 6, 2018 *Order Directing Notice, Setting Intervention Deadline, Directing Filing And Suspending Tariff*, and hereby files this application to intervene in the above captioned matter.

In support of this petition, NHT states:

1. The National Housing Trust (NHT) is a not-for-profit organization located in the District of Columbia at 1101 30th Street, NW, Suite 100A, Washington, DC 20007. NHT is dedicated to protecting and improving existing multifamily affordable housing so that low-income individuals and families can live in quality neighborhoods with access to opportunities. As a leading affordable housing policy institution, NHT works to ensure that low-income renters can benefit from energy efficient, healthy homes. NHT has long recognized that keeping energy costs low in multifamily housing is critical to maintaining affordable homes for low-income families. Together with its partners, NHT has been working to overcome the challenges to serving the multifamily housing sector with utility energy efficiency resources. In recognition of its leadership in this field, NHT was named the 2014 Andromeda Star award recipient by the Alliance to Save Energy.

2. NHT has engaged deeply with both housing and energy stakeholders in the Ameren service territory in the past, as well as with other Missouri gas utilities. NHT has a

substantial interest in Ameren Gas' proposed energy efficiency program, particularly the Low-Income program and its effect on their most vulnerable customers.

3. Pleadings, notices and other correspondence in this case should be directed to:

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And to:

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4. As an advocate for the needs of the owners and tenants of affordable housing in Missouri, NHT's interests are different than those of the general public and may be adversely affected by a final order arising from this case.

5. Granting NHT intervention will serve the public interest by assisting the Commission's record for decision in this case, especially regarding proposed energy efficiency programs impacting affordable housing. No party will be adversely affected by such intervention.

WHEREFORE, the National Housing Trust respectfully requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully Submitted,

*/s/ Andrew J. Linhares*

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ATTORNEY FOR THE NATIONAL  
HOUSING TRUST

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was either mailed, faxed, or emailed to all counsel of record on this 12th day of December, 2018.

*/s/ Andrew J. Linhares*

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Andrew J. Linhares