

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

In the Matter of a Motion for an Emergency)
Order Establishing a Temporary Moratorium)
on Utility Discontinuances to Protect Public) File No. AO-2021-0164
Health and Safety by Mitigating the Spread of)
the COVID-19 Pandemic.)

APPLICATION TO INTERVENE
OF THE NATIONAL HOUSING TRUST

COMES NOW, the National Housing Trust (“NHT”), and pursuant to 20 CSR 4240-2.075, applies to intervene in the above case. For its Application, 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 been engaged in issues relating to affordable housing, energy efficiency, and low-income Missourians for several years. Since the start of the COVID-19 pandemic, NHT has been advocating for extensions of utilities’ moratoria on disconnections. NHT has an interest in the motion for an emergency order establishing a temporary moratorium on utility

disconnections in response to the COVID-19 pandemic and its impact on Missouri's most vulnerable consumers and their access to essential, affordable utility service. As advocates for affordable housing and energy efficiency, NHT's interests are different than those of the general public and may be adversely affected by a final order arising from this case.

3. Granting NHT intervention will serve the public interest by assisting the Commission's record for decision in this case, and no party will be adversely affected by such intervention.

4. NHT supports the December 7, 2020 Motion of the Consumers Council of Missouri and respectfully urges the Commission to swiftly grant the Motion.

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

And to:

Andrew J. Linhares
Renew Missouri
3115 Grand Ave, Suite 600
St. Louis, MO 63118
(314) 471-9973
andrew@renewmo.org

Annika Brink
Midwest Director of Energy Efficiency Policy
(202) 333-8931 x141
abrindel@nhtinc.org

WHEREFORE, the National Housing Trust respectfully requests that the Commission grant this *Application to Intervene*, along with any further relief the Commission deems proper.

Respectfully,

/s/ Andrew J. Linhares

Andrew J. Linhares, MO Bar ID #63973
Renew Missouri Advocates, Inc.
3115 Grand Ave, Suite 600
St. Louis, MO 63118
(314) 471-9973
andrew@renewmo.org

ATTORNEY FOR THE NATIONAL
HOUSING TRUST

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 10th day of December, 2020:

/s/ Andrew J. Linhares