

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

In the Matter of KCP&L Greater Missouri Operations)
Company's Filing for Approval of Demand-Side) File No. EO-2015-0241
Programs and for Authority to Establish a)
Demand-Side Programs Investment Mechanism)

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

COMES NOW the National Housing Trust ("NHT"), pursuant to rule 4 CSR 240-2.075 and the Commission's August 31, 2015 *Order Directing Notice of Application, Establishing Intervention Filing Date, and Scheduling a Procedural Conference*, and hereby files this application to intervene in the above captioned matter. In support of 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. Pleadings, notices and other correspondence in this case should be directed to:

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And to:

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

4. Granting NHT intervention will serve the public interest by assisting the Commission's record for decision in this case, especially regarding proposed MEEIA programs impacting affordable multifamily buildings. 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 mailed, faxed, or emailed to all counsel of record on this 3rd day of September, 2015.

/s/ Andrew J. Linhares _____

Andrew J. Linhares