

**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
BY ARCHCITY DEFENDERS, INC.

COMES NOW, ArchCity Defenders, Inc., and pursuant to 20 CSR 4240-2.075, applies to intervene in the above-styled matter. For its Application to intervene, ArchCity Defenders, Inc., states as follows:

1. ArchCity Defenders (“ACD”) is a 501(c)(3) holistic legal advocacy nonprofit that fights against the criminalization of poverty and state violence, particularly in low-income communities and communities of color. ACD’s principal place of business is 440 N. 4th Street, Ste. 390, St. Louis, Missouri 63102.

2. ACD uses civil and criminal legal representation, social services, impact litigation, policy and media advocacy, and community collaboration to achieve justice and equitable outcomes for people throughout the St. Louis region and across the State of Missouri.

3. In support of its mission, ACD developed a robust housing practice that provides comprehensive legal services for clients at no cost with the explicit aim of promoting housing security and preventing and homelessness. Through this practice, ACD

has witnessed the inextricable link between housing insecurity and disconnection of utility services to residents living in Missouri.

4. From the beginning of the COVID-19 pandemic in St. Louis and Missouri, ACD called for a moratorium on involuntary disconnection of utility services throughout the COVID-19 pandemic.

5. Since Governor Parson's declaration of a State of Emergency in response to COVID-19, there have been no statewide protections barring involuntary utility disconnections for Missouri residents.

6. The lack of utility disconnection protections contributed to Missouri being ranked last among U.S. states and territories in terms of housing policy in response to the COVID-19 pandemic. Missouri received a 0.00/5 score in the Princeton University Eviction Lab's COVID-19 Housing Policy Scorecard.

7. ACD represents families at threat of or experiencing utility disconnection during the pandemic. The threat or actual disconnection jeopardizes these families' already precarious housing status and increases the likelihood of homelessness, exposure to COVID-19, and serious illness or death.

8. Granting ACD's request for intervention will serve the public interest by assisting the Commission's record for decision in this case.

9. As advocates for utility and housing policy in Missouri, ACD's interests are different than those of the general public and may be adversely affected by a final order arising from this case.

10. ACD provides legal and social services at no expense to low-income Missouri residents facing utility disconnection issues so the public interest is explicitly served by allowing ACD to participate in this case.

11. No party will be adversely affected by ACD's intervention in this case.

12. ACD supports the Consumer Council of Missouri's request to establish a temporary statewide moratorium on involuntary disconnection or discontinuation of residential utility service for investor-owned utilities.

13. If intervention is granted, pleadings, notices, and other correspondence in this case should be directed to the undersigned counsel for ACD.

WHEREFORE, ArchCity Defenders, Inc. respectfully requests that the Commission grant this Application to Intervene, along with any further relief which the Commission deems proper.

Respectfully Submitted,

ARCHCITY DEFENDERS, INC.

/s/ Lee R. Camp

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Certificate of Service

I hereby certify that a copy of the foregoing document and accompanying exhibits have been mailed or emailed to all counsel of record this 10th day of December 2020.

/s/ Lee R. Camp