

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company's	)	File No. GR-2017-0215
Request to Increase Its Revenue for Gas Service	)	Tariff No. YG-2017-0195

In the Matter of Laclede Gas Company d/b/a	)	File No. GR-2017-0216
Missouri Gas Energy's Request to Increase Its	)	Tariff No. YG-2017-0196
Revenues for Gas Service	)	

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

COMES NOW the National Housing Trust ("NHT"), pursuant to rule 4 CSR 240-2.075 and the Commission's April 20, 2017 *Notice of Hearing and Order Setting Conference Date, Directing Notice of Actions, Establishing Intervention Date, and Directing Filings*, and hereby files this Application to Intervene Out of Time in the above captioned matters. 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 these cases should be directed to:

Andrew J. Linhares  
Staff Attorney, Renew Missouri  
1200 Rogers St., Suite B  
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(314) 471-9973  
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And to:

Annika Brink  
Energy Efficiency Advisor, National Housing Trust  
(202) 333-8931 x141  
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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 these cases.

4. Granting NHT intervention will serve the public interest by assisting the Commission's record for decision in these cases.

5. The National Housing Trust accepts the record along with all orders, schedules and requirements of the Commission in these cases. Good cause exists to allow late intervention. Due to the difficulty of obtaining in-state counsel and internal approval, NHT was not able to meet the May 1 intervention date. The only orders yet granted are in regards to the Procedural Schedule, with which NHT has no disagreement. Granting late intervention in this instance will not adversely affected any party.

WHEREFORE, the National Housing Trust respectfully requests that it be permitted to intervene out of time and be made a party to the above-styled cases 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 22nd day of May, 2017.

*/s/ Andrew J. Linhares* \_\_\_\_\_  
Andrew J. Linhares