

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

In the Matter of The Empire District)
Electric Company's Request for Authority)
to File Tariffs Increasing Rates for Electric) File No. ER-2019-0374
Service Provided to Customers in its)
Missouri Service Area)

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

COMES NOW the National Housing Trust ("NHT"), pursuant to the Commission's August 2, 2019 *Order Suspending Tariff, Directing Notice, Delegating Authority, Setting a Deadline to Intervene, and Scheduling a Prehearing Conference* and rule 4 CSR 240-2.075, 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 with both housing and energy stakeholders across Missouri on energy issues for affordable multifamily buildings. NHT has a substantial interest in Empire District Electric Company's ("Empire") rate proposals in this case. 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.

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

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

And to:
Annika Brink
Midwest Director of Energy Efficiency
Policy, National Housing Trust
(202) 333-8931 x141
abrink@nhtinc.org

4. 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 3rd day of September, 2019.

/s/ Andrew J. Linhares

Andrew J. Linhares