

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

In the Matter of the Application of The Empire)	
District Electric Company d/b/a Liberty to)	
Implement Robust and Mutually-Beneficial)	Case No. EO-2022-0078
Energy Efficiency Offerings Under the)	
Framework Prescribed by MEEIA)	

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

COMES NOW the National Housing Trust (“NHT”), pursuant to the Commission's September 17, 2021 *Order Directing Notice of Application and Establishing Intervention Date*, 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.

2. NHT has engaged with Empire and Liberty energy efficiency staff for several years. NHT has a substantial interest in the proposed MEEIA plan's impact on Empire's most vulnerable consumers and their access to essential, affordable utility service. As an advocate for the needs of the owners and tenants of affordable multifamily buildings 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 Grand Ave, Suite 600
St. Louis, MO 63118
(314) 471-9973
andrew@renewmo.org

And to:
Annika Brink
The National Housing Trust
Midwest Director of Energy Efficiency Policy
abrindel@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 MEEIA programs impacting affordable multifamily units. 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 8th day of October, 2021.

/s/ Andrew J. Linhares
Andrew J. Linhares