

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

In the Matter of Kansas City Power & Light	)	File No. EO-2019-0132
Company’s Application for Authority to Establish a	)	Tariff No. JE-2019-0104
Demand-Side Programs Investment Mechanism	)	Tariff No. YE-2019-0103
In the Matter of KCP&L Greater Missouri Operations	)	
Application for Authority to Establish a Demand-	)	File No. EO-2019-0133
Side Programs Investment Mechanism	)	Tariff No. YE-2019-0105

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

COMES NOW the National Housing Trust (“NHT”), pursuant to the Commission's December 4th, 2018 *Order Directing Notice of Application and Order Setting Hearing*, 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 works to overcome 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 deeply with housing and energy stakeholders in the Kansas City Power & Light and KCP&L-Greater Missouri Operations’ service territories in the past, and

in preparation for these cases. NHT has a substantial interest in the proposed MEEIA plan's impact on Missouri's most vulnerable consumers and their access to affordable utility service.

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](mailto:andrew@renewmo.org)

And to:  
Annika Brink  
Energy Efficiency Advisor, NHT  
(202) 333-8931 x141  
[abrink@nhtinc.org](mailto:abrink@nhtinc.org)

4. 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.

5. 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  
Andrew J. Linhares, MO Bar ID #63973  
3115 Grand Ave, Suite 600  
St. Louis, MO 63118  
(314) 471-9973  
[andrew@renewmo.org](mailto:andrew@renewmo.org)

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 12th day of December, 2018.

/s/ Andrew J. Linhares  
Andrew J. Linhares