

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

In the Matter of The Empire District	)	
Electric Company d/b/a Liberty, The	)	
Empire District Gas Company, Liberty	)	
Utilities (Missouri Water), LLC d/b/a Liberty	)	
Utilities, and Liberty Utilities (Midstates	)	File No. AU-2021-0072
Natural Gas) Corp. d/b/a Liberty Utilities	)	
for Accounting Authority Orders Allowing	)	
the Electric, Gas, Water, and Wastewater	)	
Utilities to Record and Preserve Costs	)	
Related to COVID-19	)	

**THE NATIONAL HOUSING TRUST’S  
APPLICATION TO INTERVENE**

COMES NOW, the National Housing Trust (“NHT”), pursuant to 20 CSR 4240-2.075 and the Commission’s September 18, 2020 Order, and submits its Application to Intervene in the above case. For 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. NHT has been engaged in issues relating to affordable housing, energy efficiency, and low-income programs for several years, including in the territories of the Empire District Electric Company d/b/a Liberty, the Empire District Gas Company, Liberty Utilities (Missouri Water) and Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities (collectively the “Liberty utilities”). NHT has an interest in the Liberty utilities’ recovery of revenues lost due to the COVID-19 pandemic, and its impact on Missouri’s most vulnerable consumers and their access to essential, affordable utility service. As advocates for affordable housing and energy efficiency, 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. Granting NHT intervention will serve the public interest by assisting the Commission’s record for decision in this case, and no party will be adversely affected by such intervention.

4. NHT has not yet taken a position in this case.

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

And 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)

Annika Brink  
Midwest Director of Energy Efficiency Policy  
The National Housing Trust  
(202) 333-8931 x141  
[abrink@nhtinc.org](mailto:abrink@nhtinc.org)

WHEREFORE, the National Housing Trust respectfully requests that the Commission grant this *Application to Intervene*, along with any further relief the Commission deems proper.

Respectfully,

/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 copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 6<sup>th</sup> day of October, 2020:

/s/ Andrew Linhares