

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2nd Filing to Implement) **File No. EO-2015-0055**
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA)

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

COMES NOW the National Housing Trust (“NHT”), pursuant to the Commission's December 22, 2014 Order Directing Notice of Application and Establishing Intervention Filing 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. 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 both housing and energy stakeholders in the Ameren service territory over the last nine months, including the co-facilitation of five face-to-face stakeholder convenings in St. Louis to explore local multifamily energy efficiency offerings

from all possible angles. NHT has a substantial interest in the proposed MEEIA plan's impact on Missouri's most vulnerable consumers and their access to essential, affordable utility service.

Affordable multifamily housing units make up approximately eight percent of all housing units (and almost half of multifamily units) in the Ameren Missouri service territory.

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

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And to:

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4. 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 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

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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 13th day of January, 2015.

/s/ Andrew J. Linhares _____

Andrew J. Linhares