

**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)
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA)
File No. EO-2015-0055

**APPLICATION TO INTERVENE OF
TOWER GROVE NEIGHBORHOODS
COMMUNITY DEVELOPMENT CORPORATION**

COMES NOW Tower Grove Neighborhoods Community Development Corp (“TGNCDC”), 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 its petition, TGNCDC states:

1. Tower Grove Neighborhoods Community Development Corp is a not-for-profit organization located in the City of St Louis, 4103 Shenandoah, St. Louis, MO 63110. TGNCDC is dedicated to improving the quality of life in St. Louis, along with city wide initiatives, by working with landlords in providing tenant screening and educational workshops on best practices. TGNCDC addresses broad community development issues within the Shaw, Southwest Garden, and Tower Grove South neighborhoods, coordinating activities encouraging both private and public investment benefitting low to moderate income individuals. TGNDCD recognizes that keeping energy costs low in multifamily housing is critical to maintaining affordable homes for low-income families. Together with other area organizations, the staff of TGNCDC has been working to overcome the challenges to serving the multifamily housing sector with energy efficiency resources.

2. TGNCDC staff has engaged with property owners, renters, and energy efficiency consultants, in the Ameren MO service territory over the last two years, including pubic

presentations and stakeholder meetings in St. Louis. TGNCCDC staff and area stakeholders have explored local multifamily energy efficiency offerings from Ameren and other utility providers. TGNCCDC 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:

Andrew J. Linhares
Staff Attorney, Renew Missouri
910 E. Broadway, Ste. 205
Columbia, MO 65201
(314) 471-9973
(314) 558-8450
andrew@renewmo.org

And to:
Dana Gray
Community Outreach Coordinator
Tower Grove Neighborhoods CDC
(314) 776-3472
info@danagrays.com

4. As an owner of and advocate for the needs of the owners of affordable multifamily buildings in St. Louis, MO, the Tower Grove Neighborhoods Community Development Corp'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 TGNCCDC 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 buildings. No party will be adversely affected by such intervention.

WHEREFORE, the Tower Grove Neighborhoods Community Development Corp 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, #63973
Staff Attorney, Renew Missouri
910 E. Broadway, Ste. 205
Columbia, MO 65201
(314) 471-9973
(314) 558-8450
andrew@renewmo.org

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