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

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In the Matter of Spire Missouri Inc.'s Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas.

Case No. GR-2021-0108

## <u>APPLICATION TO INTERVENE</u> OF THE NATIONAL HOUSING TRUST

COMES NOW, the National Housing Trust ("NHT"), and pursuant to 20 CSR 4240-2.075, applies 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 was an intervenor in Spire's previous rate case (GR-2017-0215), and is an active participant in Spire's regular Energy Efficiency Collaborative. NHT is engaged in issues relating to energy efficiency and low-income utility programs. As advocates for energy efficiency, low-income programs, and affordable housing, 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, but reserves the right to do so at

hearing.

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 Annika Brink Midwest Director of Energy Efficiency Policy (202) 333-8931 x141 <u>abrindel@nhtinc.org</u>

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 Renew Missouri Advocates, Inc. 3115 Grand Ave, Suite 600 St. Louis, MO 63118 (314) 471-9973 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 21<sup>st</sup> day of December, 2020:

/s/ Andrew J. Linhares