

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

In the Matter of a Motion for an Emergency)	
Order Establishing a Temporary Moratorium)	
on Utility Discontinuances to Protect Public)	File No. AO-2021-0164
Health and Safety by Mitigating the Spread of)	
the COVID-19 Pandemic.)	

**APPLICATION TO INTERVENE
OF RENEW MISSOURI**

COMES NOW, Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), and pursuant to 20 CSR 4240-2.075, applies to intervene in the above case. For its Application, Renew Missouri states:

1. Renew Missouri is a non-profit corporation organized under the laws of Missouri with its principal place of business at 409 Vandiver, Building 5, Suite 205, Columbia, Missouri 65202. Renew Missouri is a registered fictitious name of Renew Missouri Advocates under § 417.200, RSMo. Renew Missouri is a non-profit policy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency.

2. As advocates for renewable energy and energy efficiency policy in Missouri, Renew Missouri’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 Renew Missouri 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. Renew Missouri has previously advocated for disconnection moratoriums related to COVID-19 before this Commission.

4. Renew Missouri supports the Consumers Council of Missouri's request to establish a temporary statewide moratorium on involuntary disconnection or discontinuance of residential utility service for investor-owned utilities.

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

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

Respectfully Submitted,

/s/ Tim Opitz

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 8th day of December 2020:

/s/ Tim Opitz
