

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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In re: )  
) Chapter 11  
) )  
SPORTS AUTHORITY HOLDINGS, ) Case No. 16-10527 (MFW)  
INC., et al., ) )  
) )  
Debtors. ) (Jointly Administered)  
) )  
) Re: Docket Nos. 6, 130, 544  
) Obj. Deadline: 3/22/16, 4:00 p.m.  
) Hearing Date: 3/29/16, 1:00 p.m.  
) )

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JOINDER OF ORLANDO UTILITIES COMMISSION TO THE OBJECTION  
OF CERTAIN UTILITY COMPANIES TO THE DEBTORS' MOTION FOR  
INTERIM AND FINAL ORDERS (A) PROHIBITING UTILITY PROVIDERS  
FROM ALTERING, REFUSING OR DISCONTINUING SERVICE; (B) APPROVING  
THE DEBTORS' PROPOSED ADEQUATE ASSURANCE OF PAYMENT FOR  
POSTPETITION SERVICES; AND (C) ESTABLISHING PROCEDURES FOR  
RESOLVING REQUESTS FOR ADDITIONAL ASSURANCE OF PAYMENT  
[Docket No. 544]

Orlando Utilities Commission ("OUC"), by counsel, hereby  
joins in the *Objection of Certain Utility Companies to the  
Debtors' Motion For Interim and Final Orders (A) Prohibiting  
Utility Providers From Altering, Refusing or Discontinuing  
Service; (B) Approving the Debtors' Proposed Adequate Assurance  
of Payment For Postpetition Services; and (C) Establishing  
Procedures For Resolving Requests For Additional Adequate  
Assurance of Payment* (the "Objection")(Docket No. 544), and sets  
forth the following:

Introduction

1. OUC adopts and incorporates by reference herein the  
SL1 1408402v1 018560.00205



*Introduction* section set forth in the Objection.

**Facts**

2. OUC adopts and incorporates by reference herein the *Facts* section set forth in the Objection.

**Facts Concerning the Utilities**

3. OUC adopts and incorporates by reference herein the *Facts Concerning the Utilities* section set forth in the Objection.

4. In order to avoid the need to bring witnesses and have lengthy testimony regarding OUC's regulated billing cycle, OUC requests that this Court, pursuant to Rule 201 of the Federal Rules of Evidence, take judicial notice of OUC's billing cycle. Pursuant to the foregoing request and based on the voluminous size of the applicable documents, the OUC Electric Service Policies, which sets forth the OUC billing cycle, will be provided upon request.

5. Subject to a reservation of OUC's right to supplement its post-petition deposit request if additional accounts belonging to the Debtors are subsequently identified, OUC's estimated prepetition debt and post-petition deposit request is as follows:

<b><u>Utility</u></b>	<b><u>No. of Accts.</u></b>	<b><u>Est. Prepet. Debt</u></b>	<b><u>Dep. Request</u></b>
OUC	1	\$9,314.22	\$20,000 (2-month)

6. OUC holds a surety bonds in the amount of \$29,250.

Discussion

7. OUC incorporates and adopts by reference the legal and factual arguments set forth in the Objection.

WHEREFORE, OUC respectfully requests that this Court enter an order:

1. Vacating the Injunctive Relief in the Interim Utility Order;

2. Denying the Utility Motion as to OUC;

3. Awarding OUC the post-petition adequate assurance of payment pursuant to Section 366 in the amount and form satisfactory to OUC; and

4. Providing such other and further relief as the Court deems just and appropriate.

Dated: March 23, 2016

STEVENS & LEE, P.C.

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Commission*