



Central Georgia EMC

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CLERK
U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

March 18, 2016

Gibson, Dunn, & Crutcher LLP
333 South Grand Avenue
Los Angeles, CA 90771
Attn: Sabina Jacobs, Esq.

Young, Conway, Stargatt & Taylor, LLP
Rodney Square
1000 North King Street
Wilmington, DE 19801
Attn: Elizabeth S. Justison, Esq.

IN RE: THE SPORTS AUTHORITY HOLDINGS, INC. et al., Debtor
CHAPTER 11
CASE NO. 16-10527-MFW

RE: Additional Assurance Request, Member Number 110722

To Whom It May Concern:

Central Georgia EMC has received the interim order approving adequate assurance of payment by The Sports Authority Holdings, Inc., et al.(Debtor) for post-petition services, and has reviewed the terms therein. Central Georgia EMC provides electric service to the Sports Authority distribution facility located at 130 Greenwood Industrial Parkway in McDonough, Georgia.

Prior to filing bankruptcy, the Debtor paid its electric bill for this facility in a timely manner. However, Central Georgia EMC's policy regarding prepayment (deposit) charges for commercial accounts states that a prepayment of an estimated bill of up to ninety (90) days may be collected from the customer. The Debtor has used an average of 230,930 kilowatt hours per month for the last twelve months, resulting in an average monthly bill amount of \$16,838.44.

Central Georgia EMC currently bills the Debtor for electric usage on a monthly basis, billing in the current month for the electric usage consumed during the previous month. In the Debtor's adequate assurance proposal, Central Georgia EMC will receive no cash deposit on the account, and will have access to an amount equivalent to the estimated cost for only two weeks of electric service. Based on Central Georgia EMC's billing procedures, and the large amount of kilowatt hour usage consumed by the Debtor, Debtor's proposal for adequate assurance would not adequately assure post-petition obligations. Central Georgia EMC opposes Debtor's Proposed Adequate Assurance, and requests adequate assurance in the form of a cash deposit equivalent to 90 days' billing, pursuant to its Commercial Prepayment policy.





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In the event that Debtor is unable to provide a sufficient deposit, then Central Georgia EMC would require Debtor to make payment within 5 days of the date of the monthly bill, as Debtor would only have enough deposit to cover two weeks of usage. Failure to make payment each month within the specified time frame would result in the disconnection of the electric service to Debtor's facility.

Central Georgia EMC is a non-profit organization, owned by those members we serve. Any arrears amount that we are not able to recover is a liability to the remainder of our members, who are primarily residential customers. This exemplifies the importance of establishing sufficient adequate assurance for future payments.

Very respectfully,

A handwritten signature in black ink, appearing to read "Ben Thomason". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ben Thomason
Vice President of Field Services
Central Georgia EMC



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Certificate of Service

I hereby certify that on the 18th day of March, 2016, I mailed, first class, postage prepaid, a copy of the foregoing response to the following:

Clerk, U.S. Bankruptcy Court
824 Market Street, 3rd Floor
Wilmington, DE 19801

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Signature of Respondent or Representative