

18. Moreover, if a Utility Company disagrees with the Debtor's analysis, the Utility Company may file an Objection and negotiate a resolution thereof with the Debtor and, if necessary, seek Court intervention without jeopardizing the Debtor's ongoing business operations. If a Utility Company fails to file an Objection prior to any Objection deadline established by this Court, such Utility Company shall be deemed to consent to the order entered on the Motion. *See In re Syroco, Inc.*, 374 B.R. 60, 62 (Bankr. D.P.R. 2007) (a utility company's lack of objection, response, or counter-demand after receiving notice of hearing on utilities motion, notice of interim order, and notice of final hearing constitutes tacit acceptance of the debtor's proposed two-week cash deposit as adequate assurance of payment as such term is used in Section 366 of the Bankruptcy Code).

19. Furthermore, the Court possesses the power, under Section 105(a) of the Bankruptcy Code, to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this Title." 11 U.S.C. § 105(a). The proposed procedures will ensure the Debtors continued utility services without prejudicing the Utility Companies.

20. Receiving the relief requested herein is essential for the Debtor to be able to maintain its business operations. If the Motion is not granted, the Debtor could be forced to address numerous requests by its Utility Companies in a disorganized manner at a critical point in this Chapter 11 case. Moreover, the Debtor could be blindsided by a Utility Company unilaterally deciding that it is not adequately protected and therefore that it will discontinue service or make an exorbitant demand for payment to continue service. Discontinuation of utility service could result in severe diminution of the value of the bankruptcy estate's assets. Based on the foregoing, the Debtor submits that granting the relief requested herein is both necessary and appropriate.