

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

ECTOR COUNTY ENERGY CENTER LLC,¹

Debtor.

Chapter 11

Case No. 22-10320 (JTD)

**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON APRIL 13, 2022 AT 3:00 P.M. (ET)**

This hearing will be conducted entirely over Zoom and will require all participants to register in advance. All individuals participating must register at least 2 hours prior to the hearing at the provided link.

Registration Link:

<https://debuscourts.zoomgov.com/meeting/register/vJItduqvpjovGPsbXQXjbunpa8Lk1Z8Xnk>

VOLUNTARY PETITION

1. Ector County Energy Center LLC

FIRST DAY DECLARATION

2. Declaration of John Baumgartner, Chief Restructuring Officer, in Support of Chapter 11 Petition, First Day Motions, and Related [Docket No. 2; Filed: 4/11/2022]

MATTERS GOING FORWARD

3. Application of Debtor for Entry of an Order Authorizing the Retention and Appointment of Donlin, Recano & Company, Inc. as Claims and Noticing Agent for the Debtor Effective as of the Petition Date [Docket No. 3; Filed: 4/11/2022]

¹ The last four digits of the Debtor's federal tax identification are 6852. The Debtor's mailing address is One South Wacker Drive, Suite 1900, Chicago, IL, 60606, and the Debtor has a principal place of business at 8200 OB Holt Road, Goldsmith, Ector County, Texas, 79761. More information about the Debtor and this case is available on the website maintained by Donlin, Recano & Company, Inc., the Debtor's proposed claims and noticing agent, at www.donlinrecano.com/ecec, or can be requested by e-mail at ececinfo@donlinrecano.com.

² Amended items appear bold.

Related Document(s):

- a) **Application of Debtor for Entry of an Order Authorizing the Retention and Appointment of Donlin, Recano & Company, Inc. as Claims and Noticing Agent for the Debtor Effective as of the Petition Date [Docket No. 61; Filed: 4/13/2022]**

Status: The Debtor has amended the declaration and proposed form of order in accordance with informal comments received from the Office of the United States Trustee. This matter will go forward.

4. Motion of Debtor for Interim and Final Orders (i) Authorizing Debtor to (a) Continue Existing Cash Management System, and (b) Maintain Existing Bank Accounts and Business Forms; (iii) Waiving Requirements of 11 U.S.C. § 345(b); and (iii) Granting Related Relief [Docket No. 4; Filed: 4/11/2022]

Status: The Debtor has received informal comments from the Office of the United States Trustee and is working to resolve those comments in revised forms of order. This matter will go forward on an interim basis.

5. Motion of Debtor for Entry of Interim and Final Orders (i) Prohibiting Utility Providers From Altering, Refusing or Discontinuing Utility Services, (ii) Approving Proposed Adequate Assurance of Payment to Utility Providers and Authorizing Debtor to Provide Additional Assurance, (iii) Establishing Procedures to Resolve Requests for Additional Assurance and (iv) Granting Related Relief [Docket No. 5; Filed: 4/11/2022]

Status: The Debtor has received informal comments from the Office of the United States Trustee and is working to resolve those comments in revised forms of order. This matter will go forward on an interim basis.

6. Motion of Debtor for Entry of Interim and Final Orders (i) Authorizing the Debtor to Use Cash Collateral, (ii) Granting Adequate Protection to Prepetition Secured Lenders, (iii) Modifying the Automatic Stay, (iv) Scheduling a Final Hearing, and (v) Granting Related Relief [Docket No. 6; Filed: 4/11/2022]

Response(s) Received:

- a) **Direct Energy Business Marketing, LLC's Preliminary Objection to Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtor to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Lenders, (III) Modifying Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 55; Filed: 4/13/2022]**

Related Document(s)

- a) **Notice of Revised Interim Order Authorizing the Debtor to (I) Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Lenders, (III) Modifying Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 64; Filed: 4/13/2022]**

Status: The Debtor has received informal comments from the Office of the United States Trustee and the agent to the cash collateral lenders and is working to resolve those comments in revised forms of order. This matter will go forward on an interim basis.

[signature page follows]

Dated: April 13, 2022
Wilmington, Delaware

Respectfully submitted,

/s Christopher A. Ward

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*Proposed Counsel for the Debtor and
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