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February 19, 2003

Ms. Adrienne Vining
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RE: Docket No. 020824-EI
Petition for waiver of requirement of Rule 25-6.015(3), F.A.C.

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COMMISSION CLERK

Dear Ms. Vining:

This letter will confirm our recent conversation regarding Florida Power & Light Company's ("FPL's") document conversion process.

In Order No. PSC-02-1623-PAA-EI the Florida Public Service Commission granted FPL's request to modify its electronic data storage method. Specifically, the Commission approved FPL's request to eliminate use of the Anacom Computer-Output-Microfiche system in reliance on the On-Demand automated report management system, and approved FPL's use of the Documentum system to maintain electronic documents that are created by scanning paper documents. The Commission found that FPL's "method of storing data electronically meets the requirement for waiver of Rule 25-6.015(3)(a), Florida Administrative Code, which is that the utility 'employ a storage and retrieval system that consistently produces clear, readable copies that are substantially equivalent to the originals, and clearly reproduces handwritten notations on documents.'" Order No. PSC-02-1623-PAA-EI at 4.

The On-Demand system captures corporate records that are generated electronically. Paper documents, on the other hand, are scanned and uploaded to the Documentum system. FPL will not change these processes and will continue using both of the approved systems. Currently, paper documents are scanned by FPL employees for uploading into the Documentum system. In order to reduce expense and increase efficiency, FPL plans to outsource the task of document scanning.

Currently, paper documents are received, sorted, scanned and indexed by FPL's in-house Integrated Document Management group. Documents are quality checked for completeness, legibility and readability and are then made available in the Documentum system.

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FPSC-BUREAU OF RECORDS

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FPSC-COMMISSION CLERK

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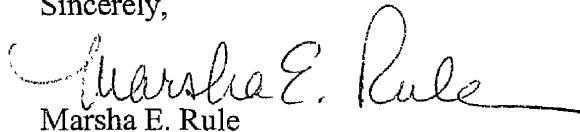
February 19, 2003

FPL's proposed process will be the same, but the scanning function will be performed by a third party pursuant to contract. The method of copying source documents will remain the same. Documents will be scanned to the same technical specifications required of the in-house operation, will continue to be indexed based on existing parameters, and will be quality checked for completeness, legibility and readability. The electronic documents then will be transferred to FPL to be verified and made available in the Documentum system.

In Order No. PSC-02-1623-PAA-EI, the Commission required FPL to petition for a new rule waiver "if it changes the vendor or method used to copy its source documents." Order No. PSC-02-1623-PAA-EI at 5. FPL believes, and has confirmed with Staff, that no waiver is necessary in order for FPL to outsource the scanning process because FPL will continue to use the approved Documentum system as well as its existing methods and processes for copying and storing source documents.

Thank you for your assistance in this matter. Please feel free to call me if you have any questions or would like to discuss this matter further.

Sincerely,



Marsha E. Rule

cc: Mr. Carlos Diaz, FPL