

REQUEST TO ESTABLISH DOCKET
(PLEASE TYPE)

Date November 19, 1997

Docket No. 971533-ET

1. Division Name/Staff Name Division of Auditing and Financial Analysis (Vandiver)
2. OPR AFA (Vandiver, Sienkewicz) WJS MY
3. OCR Division of Legal Services
4. Suggested Docket Title Request for Waiver of Rule 25-6.015, FAC in order to microfilm and destroy records before end of three year retention period by Tampa Electric Company

5. Suggested Docket Mailing List (attach separate sheet if necessary)

- A. Provide NAMES ONLY for regulated companies or ACRONYMS ONLY regulated industries, as shown in Rule 25-22.104, F.A.C.
- B. Provide COMPLETE name and address for all others. (Match representatives to clients.)

1. Parties and their representatives (if any)

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

2. Interested Persons and their representatives (if any)

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

6. Check one:

- Documentation is attached.
 Documentation will be provided with the recommendation.



GLB
PLB
B. William
ALL

December 23, 1996

Mr. Timothy J. Devlin, Director
Division of Auditing and Financial Analysis
Florida Public Service Commission
Room 215J - Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Request for Waiver of Record Retention Requirement
as Contemplated in Rule 25-6.015(3)(a), Florida
Administrative Code

Dear Mr. Devlin:

The above-referenced Commission rule requires that all source documents retained as required by Title 18, Subchapter C, Part 125, Code of Federal Regulations, be maintained in their original form for a minimum of three years, or for any lesser period of time specified for that type of record in Title 18, Subchapter C, Part 125, Code of Federal Regulations. The Commission's rule states that the Commission may waive the requirement that documents be retained in their original form upon a showing by a utility that it employs a storage retrieval system that consistently produces clear, readable copies that are substantially equivalent to the originals, and clearly reproduces handwritten notations on documents. The purpose for this letter is to request such a waiver with respect to all source documents which have been placed on microfilm in accordance with Tampa Electric's microfilming procedures.

At the present time microfilm is the medium being used by Tampa Electric to convert source documents which are required to be retained by Title 18. Written procedures governing the conversion of source documents to this medium are maintained within the company's micrographic department.

Each roll of microfilm is indexed for easy retrieval. Original microfilm is maintained in the vault at the corporate record center and a copy is distributed to the originating department. Microfilm stored at the corporate record center is checked on an annual basis to insure archivability. Microfilm reader/printers are available throughout the company.

Mr. Timothy J. Devlin
December 23, 1996
Page 2

The following procedures are used for each record conversion:

- ▶ All filming is done using National Micrographic Association standards.
- ▶ Preparation for filming consists of arranging each document in the proper order, removing staples and paper clips, taping torn pages, taping down small receipts, and preparing microfilm targets.

Cameras used for 16mm microfilming are:

- ▶ 3M EF5000 Business Document Rotary Camera with Blip capabilities.
- ▶ 3M 6600B Mixed Document Rotary Camera with Blip and Sequential Frame Numbering and Model 416 Continuous Form Feeder.
- ▶ Minolta 2800 Automatic Microfilm Camera.

All of the above-listed cameras film in simplex format and the reductions vary - 24X, 26X, and 32X. All cameras are under maintenance agreements. They are cleaned and preventive maintenance is performed on a regular basis.

All 16mm jobs are filmed on Fuji HRII High Resolution Film. The film is processed in-house on an Allen Processor, Model M-20CR. Chemicals used are the Fuji 455 Fixer and 537 Microflo Developer. Attached to the processor is a Roconex Ultra Silver Recovery Unit. Both of these pieces of equipment are under maintenance agreements. Preventive Maintenance and cleaning are done regularly.

Each roll of film is individually quality control inspected. The resolution (clarity) is checked under a microscope from the resolution test pattern target. The background density and D-Min (darkness) are checked with a densitometer. Each roll is scanned on a microfilm viewer to check for legibility, folds, overlapping, light streaks, etc. If refilms are required, they are refilmed using a "Certificate of Records Additions" and spliced onto the end of the roll. Any refilms are also noted on the outside label of the roll.

Methylene Blue Testing (Residual Thiosulfate Testing) is done quarterly. This is a commonly used method to insure archival quality of processed silver microfilm. This test is performed by an outside laboratory, FR Chemicals.

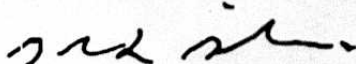
Mr. Timothy J. Devlin
December 23, 1996
Page 3

By adhering to these policies and procedures, we feel that Tampa Electric Company employs a storage and retrieval system that consistently produces clear, readable copies that are substantially equivalent to the originals, and clearly reproduce handwritten notations on documents.

Based on the foregoing, Tampa Electric requests that it be granted a waiver from the source document retention requirements of Rule 25-6.015, Florida Administrative Code, for all source documents that have been placed on microfilm in accordance with the procedures described above.

If you have any questions concerning our microfilming procedures, you may contact Bonnie Williams, Record Management Analyst, (813) 225-5137.

Sincerely,



Gordon L. Gillette
Vice President Regulatory and Business Strategy