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RECORDS AND  
REPORTING

November 15, 2000

**VIA HAND DELIVERY**

Ms. Blanca S. Bayó  
Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Room 110  
Tallahassee, FL 32399-0850

**In Re: Proposed Amendments to Rule 25-17.0832, F.A.C., Firm  
Capacity and Energy Contracts; Docket No. 001574-EQ;  
Notice of Proposed Rule Development**

Dear Ms. Bayó:

Please accept for filing the original and fifteen (15) copies of this letter as Florida Power & Light Company's ("FPL") request for a rule development workshop in connection with the Notice of Proposed Rule Development issued in the above-numbered and entitled proceeding and published November 3, 2000 in the Florida Administrative Weekly. This request is made pursuant to Section 120.54(2)(c), Florida Statutes, and Rule 28-103.002 of the Florida Administrative Code.

FPL submits that a suitable number of workshops should be conducted relative to the development of amendments to Rule 25-17.0832 (the "Rule"). The issues to be addressed are complex and potentially controversial. For example, the removal of a subscription limit for standard offers where capacity is not avoided, without additional changes to the Rule, would increase the likelihood of customer-subsidization of qualifying facilities, a result FPL contends is not appropriate under either Federal or Florida law. For these same reasons, the proposed amendments to the Rule necessarily will involve competing points of view and will have a significant impact on regulated interests. A rule development workshop would assist the Commission and its Staff to better understand and address the concerns of the affected entities, including investor-owned utilities such as FPL.

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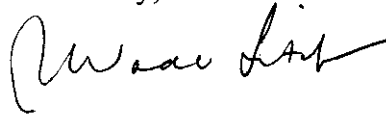
Blanca S. Bayó  
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FPL respectfully requests that the workshop scheduled for December 12, 2000 be held, and that further workshops be scheduled as necessary to allow FPL, Staff, and other interested parties a meaningful opportunity to discuss and consider the development of appropriate amendments to the Rule.

A copy of this letter is being provided on the enclosed diskette in Word Perfect Version 6/7/8.

Should you or your staff have any questions regarding this request, please don't hesitate to contact me.

Sincerely,

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

R. Wade Litchfield

RWL/jsb  
Enclosures

cc: Service List