



Friday, August 1, 2008

Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

**Re: File Number S7-11-08**

We are pleased to be able to provide feedback on the SEC's proposed rule regarding Interactive Data to Improve Financial Reporting. FPL Group recognizes the importance of providing financial information in a form that is useful to investors; however, we believe that the costs of providing such financial information in interactive data format using XBRL currently outweigh the benefits.

The limited benefits of providing financial information in XBRL format would come at a significant cost to our company. The SEC filings for FPL Group and its subsidiary, Florida Power & Light Company, are currently prepared in-house by report technicians using Microsoft Word and the SEC's free software, EDGARLink. We incur no additional software or staffing costs. The implementation of XBRL would add significant costs to this process because we would have to purchase software, pay for assistance in its implementation and pay annual maintenance fees for that software.

In addition to these costs, our filing process would require additional resources. FPL Group would need to assign technical accounting staff to work with our report technicians to ensure the line items in our financial statements are properly associated with the correct taxonomy. In cases where there is no standard taxonomy, they would have to assist in creating company-specific tags. This is a process that would need to be repeated each quarter to ensure any new activities or reclassifications are considered and that taxonomies remain appropriate for each line item presented in the financial statements. Also, these activities would have to be performed during a time period where our resources are already stretched with the implementation of numerous new disclosure requirements, as well as the preparation of our quarterly filings and the related quality checks.

FPL Group has found that XBRL software costs have increased significantly since the SEC issued its proposed rule regarding interactive data. We received an estimate for XBRL/HTML software in May 2008 from a software vendor. After the proposed rule was released by the SEC, two months later, the vendor's quote increased 64.8%. The vendor cited the proposed SEC requirement and increased demand as reasons for the price increase. Given the short implementation timeframe outlined in the proposed rule

and the fact that companies need to purchase software to file in XBRL, we do not have many options.

Companies that currently use external sources to file their SEC filings will also be affected by the proposed rule. The implementation of XBRL will require company resources to work with the vendors to determine and/or verify the XBRL taxonomies associated with each financial statement line item. This too will require additional time and resources that are not built into today's processes for those companies. These added costs come at a time when many companies are struggling financially to overcome the significant challenges created by the economic downturn.

One of the benefits of providing financial information using XBRL cited in the SEC's proposed rule is that it will facilitate the exchange of information between issuers, financial analysts and other intermediaries who receive and process the financial reports of public companies. We agree that there would be some benefit to this. However, it has been our experience that financial analysts are particularly interested in forecasted information and in earnings excluding non-recurring items, i.e. non-GAAP information that is typically not contained in a company's Form 10-K or 10-Q. Therefore, we believe that if implemented, registrants would incur these added costs for what are at best limited benefits to users of the financial statements.

Should the SEC decide to require registrants to provide financial information using XBRL despite the added costs, we strongly believe the proposed implementation schedule should be delayed at least one year to allow registrants and external service providers to staff for the new activities and to perform some test filings. This would also allow external service providers additional time to prepare for the increased demands of clients. In addition, we recommend that the first required XBRL submission be that of a Form 10-Q rather than a Form 10-K. The learning curve is steep and the costs are significant; therefore, until the rules are finalized, many registrants are hesitant to invest the time and money required to provide financial information using XBRL.

In closing, we believe that the SEC is underestimating the complexity and cost of providing information in interactive data format using XBRL and may be overestimating the benefits to investors. We believe the SEC must consider the economic hardship that many companies are currently facing and that mandating XBRL in the manner recommended by this proposed rule will further contribute to such hardships without providing immediate benefits. Please consider delaying the implementation XBRL by at least one year.

We thank you for the opportunity to comment on the proposed rule. Your consideration of our comments is appreciated.

Sincerely,

K. Michael Davis  
Controller and Chief Accounting Officer of FPL Group, Inc. and

Vice President, Accounting and Chief Accounting Officer of Florida Power & Light Company