



FPL Group, Inc., P.O. Box 14000, Juno Beach, Florida 33408-0420

April 20, 2009

Ms. Florence E. Harmon
Acting Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-1090

RE: File Number S7-27-08, IFRS Proposed Roadmap

Dear Ms. Harmon:

FPL Group, Inc. (“We” or “the Company”) appreciates the opportunity to comment on the Securities and Exchange Commission’s (Commission) proposed roadmap (the Roadmap) for the adoption of International Financial Reporting Standards (IFRS) by U.S. registrants. FPL Group is a nationally known energy company, with over \$16 billion in revenues in 2008. Its rate-regulated subsidiary, Florida Power & Light Company, serves approximately 4.5 million customer accounts in Florida. Additionally, NextEra Energy Resources, LLC, an FPL Group competitive energy subsidiary, is a leader in producing electricity from clean and renewable fuels in 25 states and Canada.

We commend the Commission for issuing the Roadmap, which is an important step toward realizing the goal of using a single set of high quality accounting standards as a means of improving the quality and comparability of financial reporting internationally. While we believe that consistent financial reporting among companies reporting in the U.S. and competing for global capital is an important goal, there are several issues which should be thoroughly considered by the SEC before IFRS is mandated. We request the Commission to consider our following concerns with the Roadmap, as well as our recommendations:

The Cost of Adopting IFRS May Outweigh the Benefit:

There is no question that the adoption of IFRS by U.S. public companies will be a monumental effort, which will require companies to incur significant costs. At this point, we do not believe that the Commission has demonstrated that the cost of adopting IFRS justifies the benefits to be received. Given the state of the U.S. economy, we question whether the time is right to launch into this costly process. Spending considerable amounts of money to convert to IFRS in the near future (as early as 2014 for some companies) just for the sake of adopting global accounting standards may not be prudent,

especially given the fact that U.S. GAAP continues to provide a solid accounting foundation to both public and private companies.

U.S. companies should not be required to adopt IFRS until the Commission has demonstrated that IFRS clearly represents an equal or higher quality of accounting standards than U.S. GAAP. U. S. GAAP has been painstakingly developed over decades, evolving to address changing business models and, in most cases, to portray the economic substance of transactions reflected in financial statements. IFRS, in comparison, is in its infancy at least in terms of widespread use. While the IASB is committed to retaining a “principles-based” approach, only time will tell if that approach is comprehensive enough to address transactions in multiple countries, with varying regulatory structures and political/legal environments.

Overall, we support the Commission’s ultimate goal of having a high-quality single set of accounting principles. However, we believe this goal can be reached in a way that does not put such a tremendous strain on companies’ financial systems and resources.

Recommendation:

We recommend that a detailed study be conducted by the Commission, which fully considers the different paths and options possible to meet the stated objective, one of these approaches being continued convergence (further discussed below). This study should cover the costs, benefits, strengths, weaknesses of the different paths possible, to ensure that the most effective path is chosen. It is paramount that the Commission perform this full cost-benefit analysis and give due consideration of all options before making the decision to require U.S. public companies to adopt IFRS. We recommend that this study be completed as soon as possible to reduce the uncertainty that currently exists.

Timeframe of the Commission’s final decision:

As proposed in the Roadmap, large, accelerated filers, such as FPL Group, could be required to adopt IFRS as early as January 1, 2014. Additionally, because the Roadmap currently requires three years of comparative financial information in the first financial statements under IFRS, the Company would be required to begin capturing IFRS data beginning in 2012. We are extremely concerned that the Commission is proposing to make the final decision to adopt IFRS in 2011, only one year (or possibly months or weeks if the decision is made toward the end of 2011) before the Company will need to begin capturing IFRS financial data. This timeline is unreasonable given the enormous cost and effort involved in adopting IFRS. The only way that companies can truly be ready to begin capturing IFRS data in 2011 is to incur significant costs before knowing if the Commission will, in fact, go forward with the requirement to adopt IFRS. This unrealistic timeline creates an unnecessary economic burden on companies, and it forces them to accept a high level of risk if they decide to take the “wait and see” approach as the Commission makes its final decision regarding IFRS adoption, currently in 2011. The uncertainty around whether and when adoption of IFRS will be required makes it difficult for management to properly assess the risks, costs, and resources needs. The adoption of IFRS will result in profound changes to companies’ accounting systems,

process and controls, and financial reporting. In order for the process to be as efficient and effective as possible, we believe that the Commission needs to provide companies with a clear path to follow related to IFRS, free from as many uncertainties as possible. Until the SEC commits to a definitive plan, constituents will be unwilling to take the necessary steps to prepare for an orderly and successful transition to IFRS. Failure to remove the uncertainties, such as the timing of adoption, is not in the best interests of preparers or users of financial statements and could ultimately undermine the reliability of financial reporting in the capital markets.

Recommendation:

As stated above, the Commission should perform an in-depth cost-benefit analysis and give due consideration of all options before making the decision to require U.S. public companies to adopt IFRS. Based on this analysis and considerations of the Milestones discussed in the Roadmap, if the Commission deems it necessary to require U.S. public companies to adopt IFRS, we recommend that the Commission commit to a definitive plan, which removes any uncertainty related to the timing of IFRS adoption. We also recommend that the Commission allow at least 3 years between the point at which it decides to require mandatory adoption of IFRS and the earliest date of transition to IFRS (i.e., opening balance sheet). Allowing companies adequate time to fully prepare, with a clear understanding regarding the timing of the conversion, will provide a more stable environment for change and will likely lower the overall cost of adoption by reducing the “fire drill” implementation that would most likely occur for many companies under the proposed timeline in the Roadmap. Ultimately, this recommended approach will have a positive impact on the quality of financial information provided to users, which is an overriding goal that can not be overlooked.

Presentation of Comparative Periods:

We do not agree with the Commission's proposal to require three years of audited IFRS financial statements in the initial year of IFRS adoption. This requirement is inconsistent with the requirements of IFRS 1, *First-time Adoption of International Financial Reporting Standards*. Additionally, under the proposed timeline (discussed above), it is unreasonable to expect companies to be able to collect and process financial data under IFRS only one year after the Commission has made its final determination regarding the adoption of IFRS. This requirement may also hinder companies from electing to early adopt IFRS, as allowed by the Roadmap.

Recommendation:

We believe that the Commission should allow U.S. issuers to provide only one year of comparative information in the year of adoption for a total of two years of IFRS financial statements. This is consistent with the requirements of IFRS 1, and the previous Commission accommodation regarding first-time adoption of IFRSs by foreign private issuers. It also would make the transition timeline more reasonable and less costly for companies to adopt IFRS.

Delegation of Authority to an International Organization:

As stated in the Roadmap, the Commission's participation in the oversight of the International Accounting Standards Board (IASB) would be performed through the participation in the Monitoring Group, proposed by the IASB's governing body, the IASC Foundation. Therefore, the Commission would have less direct oversight over the standard setting process than it currently has with respect to the Financial Accounting Standards Board (FASB) and the Financial Accounting Foundation. We have significant concerns related to transferring U.S. standard setting to an international organization. Over the last decade, our country has experienced situations in which Congress and the Commission have taken direct and immediate action in order to minimize the negative impacts on the U.S. economy and capital markets associated with certain significant economic events (and the related accounting effects). Prime examples of this are the Enron debacle in 2001, and more recently, the current economic crisis, which unfortunately exposed some significant deficiencies in U.S. GAAP. While we generally believe the development of accounting standards is best handled by an independent standard setting body such as the FASB, rather than by elected members of Congress, it is comforting to know that when the need arises, these parties can all work together to address needed changes in the accounting rules to protect U.S. investors. If U.S. companies are required to adopt IFRS, as issued by the IASB, the ability to influence the outcome of the standard setting process will be greatly reduced.

Recommendation:

If the Commission requires U.S. public companies to adopt IFRS, as issued by the IASB, this decision should be fully supported by Congress. Accordingly, we recommend that approval of Congress be added as an additional Milestone in the Roadmap. Congress must be willing to let U.S. public companies apply accounting principles established by an international organization, with the understanding that there will be less opportunity to influence those principles. While the Commission could presumably require certain applications of accounting standards on a basis different from IFRS (jurisdictional IFRS), this undermines the goal of achieving a single set of high quality accounting standards.

Convergence Efforts:

As stated in the Roadmap, the Commission continues to support the joint efforts of the IASB and the FASB as an important means of increasing the quality of IFRS and U.S. GAAP and, at the same time, reducing disparity between the two. We also support the convergence efforts between the IASB and FASB, and we believe the ongoing joint convergence project is critical to the success of the potential mandatory adoption of IFRS by U.S. public companies in the future. We believe that the most efficient path to an eventual adoption of IFRS by U. S. companies is one in which the process of converging U.S. GAAP and IFRS is substantially complete before the mandatory adoption of IFRS. The process of convergence focuses on selection of the best accounting principles from the existing IFRS and US GAAP standards, or allows the standard setters to go a completely different direction when they believe doing so results in better accounting (as is expected with leases, for example).

Gradual convergence also allows companies to address the accounting changes in an orderly and disciplined manner, rather than having to address all changes at one time. Adopting IFRS will be costly for companies. However, we believe that some of these costs can be significantly reduced by allowing adequate time for the convergence effort before requiring the adoption of IFRS. This would be a more efficient approach because it would narrow the differences and ultimately provide users with financial accounting and reporting information that achieves the objective of global transparency and comparability of financial information.

Recommendation:

We believe that the ongoing efforts between the IASB and the FASB to converge IFRS and U.S. GAAP should play a significant and instrumental part in realizing the Commission's goal of having a single set of high quality accounting standards. Therefore, we recommend that FASB and IASB continue to work together to converge the two sets of standards in a way that will provide the most relevant and reliable financial statements. The Commission should not require U.S. public companies to adopt IFRS, as issued by the IASB, until the convergence effort related to significant accounting standards has been completed.

“Principle-based” approach may not be appropriate for US:

One of the reasons that the adoption of IFRS in the U.S. has gained recent support is the fact that it is generally considered to be “principles-based,” whereas U.S. GAAP is generally considered to be “rules-based.” However, the need for definite “rules-based” standards in the U.S. should not be underestimated, given the litigious environment that currently exists in the U.S. Early on, U.S. Generally Accepted Accounting Principles started out as just that... “accounting principles.” However, over time, the U.S. standard setters found it necessary to develop interpretative rules around the standards in order to ensure that companies applied them fairly and consistently. As a result of this process, the U.S. legal environment has come to significantly depend on these interpretative rules. If the Commission requires companies to adopt IFRS, we believe there could be a significant increase in unreasonable and costly shareholder lawsuits, as plaintiff lawyers question the “principles-based” judgments made by the companies' management as they apply the guidance in IFRS.

Under IFRS, companies are required to expand their disclosures to fully discuss and disclose their thought process, assumptions, and judgments made in accounting for its transactions. However, several aspects of current IFRS might be difficult to apply in the U.S. For example, the IFRS standard on contingent liabilities has been argued to be incompatible with the legal environment in the U.S. because preparers would be compelled to reveal potentially damaging information about their litigation. We are concerned that requiring significantly expanded disclosure of these items could have a detrimental impact on companies and their shareholders, while providing little or no value to current and potential investors. We believe the FASB and the Commission are aware of and understand our concern on this issue, since the FASB recently reconsidered its proposal regarding the disclosures of loss contingencies, due to the overwhelmingly negative response it received from constituents on this topic.

Recommendation:

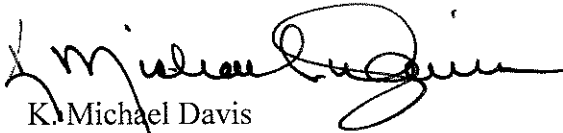
Before the Commission decides to mandate the use of IFRS by U.S. public companies, it should consider whether application of those standards is workable for the current U.S. environment.

Summary:

FPL Group, Inc. supports the Commission's efforts toward the goal of a single set of global accounting standards. However, we believe that the Commission is obligated to perform an in-depth cost benefit analysis and to consider all paths, including convergence, before determining if U.S. public companies should be required to adopt IFRS. Additionally, the Commission should reconsider the timeline of adoption, in order to minimize the financial burden on companies and the U.S. economy, in general. Finally, we encourage the Commission to consider a transition plan based upon allowing the continuance of the joint efforts of the FASB and the IASB toward the goal of, eventually, having a single set of high quality global financial standards.

Thank you for the opportunity to comment on the Roadmap. Your consideration of our comments is greatly appreciated. We would be happy to answer any questions that you might have, and we are willing to assist you in the further development of the Roadmap. If you have any questions, please contact me at (561) 694-6250.

Sincerely,



K. Michael Davis
Controller and Chief Accounting Officer