**FLORIDA PUBLIC SERVICE COMMISSION**

**Fletcher Building**

**101 East Gaines Street**

**Tallahassee, Florida 32399-0850**

**M E M O R A N D U M**

**September 30, 1993**

**TO : DIRECTOR, DIVISION OF RECORDS AND REPORTING**

**FROM : DIVISION OF AUDITING AND FINANCIAL ANALYSIS (SLEMKEWICZ, VANDIVER)**

**DIVISION OF LEGAL SERVICES (BROWN)**

**RE : DOCKET NO. 930938-EI - FLORIDA POWER AND LIGHT COMPANY - REQUEST FOR WAIVER OF RULE 25-6.015(3)(a), F.A.C., REGARDING RETENTION OF SOURCE DOCUMENTS IN THEIR ORIGINAL FORM FOR A MINIMUM OF THREE YEARS BY FLORIDA POWER AND LIGHT COMPANY**

**AGENDA : 10/12/93 - REGULAR AGENDA - PROPOSED AGENCY ACTION - INTERESTED PERSONS MAY PARTICIPATE**

**CRITICAL DATES: NONE**

**SPECIAL INSTRUCTIONS: I:\PSC\AFA\WP\930938.RCM**

**DISCUSSION OF ISSUES**

**ISSUE :** Should the utility's request for waiver of Rule 25-6.015(3)(a) be granted?

**RECOMMENDATION:** The utility's request for waiver should be denied as it applies to those documents copied using the imaging process and granted with regard to those documents copied using the microfilm and microfiche process. The Company should also notify the Division of Auditing and Financial Analysis if it changes the method used to copy its source documents.

**STAFF ANALYSIS:** By letter dated July 22, 1993, Florida Power and Light Company (FPL or Company) requested a waiver of Rule 25-6.015(3)(a), F.A.C., regarding the retention of source documents in their original form for a minimum of three years. FPL states that it believes that its current storage and retrieval systems meet the standards now required by rule in that they produce copies equivalent to originals.

The audit staff visited the Company to review its records. This review included a tour of the Micrographic Services Department at the FPL general office location and identifying the three methods used by FPL to store information: microfilm, microfiche, and imaging. The utility request states that the following locations are where the microfilm and microfiche systems are currently employed:

1. Office Facility (Juno Beach)

2. General Office (Miami)

3. Office Facility (North Palm Beach)

4. Nuclear Division

Office Facility (Juno Beach)

St. Lucie Plant

Turkey Point Plant

5. St. Johns River Power Park (Jacksonville)

6. Scherer Unit No. 4

However, staff review indicates that the General Office location is the only one that processes both microfilm and microfiche. Microfilm only is used at the Juno Beach Office Facility, the Nuclear Division (all three locations) and Scherer Unit No. 4. The remaining two locations (North Palm Beach Office Facility and St. Johns River Power Park) are currently processing records using imaging.

Staff reviewed the utility's process for processing documents. All microfilm and microfiche documents contain a Certificate of Authenticity and a Declaration of Intent and Purpose at the start and a Certificate of Authenticity at the end. Staff review of the microfilm and microfiche copies indicates that the process produces clear and readable copies substantially equivalent to the originals.

FPL expects to expand the use of the imaging process to the Miami General Office, in addition to the two locations where it is currently used. When imaging is used, the scanned information is converted to digital information and is stored in optical disk plotters. Some of the advantages of the imaging process is that information is imported and exported electronically. This process will also link mainframes and enhances the work flow by setting up various activities simultaneously. The drawback of using the imaging process is that the information is not easily transportable because the equipment is very vendor specific and sometimes may not even be transportable within the same vendor. Information can be transported rapidly through the use of the network, however, staff may not be able to look at source documentation through the network unless an appropriate protocol or conversion process is in place. The utility does not yet have such a process at all its offices and indicated to the audit staff that it plans to request a separate waiver of the rule for those documents copied using the imaging process at a later date. Based on the utility's statement, the audit staff did not review any copies made using this process.

Therefore, based on staff review, we recommend that the utility's request for waiver be granted in part and denied in part. Staff recommends that with regard to those documents copied using the microfilm and microfiche process, the utility's request should be granted. However, the request should be denied as it applies to those documents copied using the imaging process. Staff is concerned whether there will be dependable, continued access to copies made using this process and until these concerns are addressed, staff believes that the utility, as required by the rule, should maintain the original source documents for three years.

Because this waiver is based on the staff's review of the current methods used to copy documents, staff is concerned that the readability of the copies may change if the Company makes a change in vendors, or some other part of the process. Therefore, we recommend that the Company notify the Division of Auditing and Financial Analysis if it changes the method used to copy its source documents.

**ISSUE 2:** Should the docket be closed?

**RECOMMENDATION:** Yes, if no protests are received the docket should be closed.

**STAFF ANALYSIS:** If the staff's recommendation in Issue 1 is accepted and no protests are received, there are no other issues to be considered and the docket should be closed.

**D R A F T**

**RECOMMENDATION REVIEW DEADLINE**

Docket No. 930938-EI Author:Denise V.

Title: FP&L request for waiver of Rule 25-6.015(3)(a)

Brief Description: Request to microfilm and destroy original records before end of three year retention period

**Division Name Date/Time Due Back to Author**

AFAD

Author Denise Vandiver \_\_\_\_\_\_\_\_\_\_\_\_\_

Supervisor John Slemkewicz \_\_\_\_\_\_\_\_\_\_\_\_\_

Bureau Chief Dale Mailhot \_\_\_\_\_\_\_\_\_\_\_\_\_

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Other \_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_

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Asst. Director Beth Salak \_\_\_\_\_\_\_\_\_\_\_\_\_

Director Tim Devlin \_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_

LEGAL

Attorney Xxx Xxxxxx \_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_

Bureau Chief M. Palecki \_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_

ELECTRIC AND GAS

Analyst \_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_

Supervisor \_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_

Bureau Chief \_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_

Asst. Director B. Trapp \_\_\_\_\_\_\_\_\_\_\_\_\_

Director J. Jenkins \_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_

NOTE:Drafts of recommendations are due to the Bureau Chief and Director of AFAD as well as appropriate staff of other divisions the Friday before the Thursday filing deadline with Records.

Left by: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, AFAD

Place check by name if hand delivered.