

FLORIDA PUBLIC SERVICE COMMISSION
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M E M O R A N D U M

AUGUST 22, 1996

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYO)

FROM: DIVISION OF AUDITING & FINANCIAL ANALYSIS (SLEMKEWICZ, JS DM
VANDIVER) W
DIVISION OF LEGAL SERVICES (WAGNER) W mod 188

RE: DOCKET NO. 960516-EI - FLORIDA POWER AND LIGHT COMPANY -
REQUEST FOR WAIVER OF RULE 25-6.015, F.A.C. IN ORDER TO
MICROFILM AND DESTROY RECORDS BEFORE END OF THREE-YEAR
RETENTION PERIOD

AGENDA: 09/03/96 - REGULAR AGENDA - PROPOSED AGENCY ACTION -
INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: S:\PSC\AFA\WP\960516.RCM

DISCUSSION OF ISSUES

ISSUE 1: Should the utility's request for waiver of Rule 25-6.015(3)(a), F.A.C. be granted?

RECOMMENDATION: Yes. The utility's request for waiver should be granted. The utility should also notify the Division of Auditing and Financial Analysis if it changes the method used to copy its source documents. (VANDIVER)

STAFF ANALYSIS: In July, 1993, Florida Power and Light Company (FPL) requested a waiver of Rule 25-6.015(3)(a), Florida Administrative Code, requiring the retention of source documents in their original form for a minimum of three years. By Order No. PSC-93-1518-FOF-EI, issued October 15, 1993, the Commission granted the request with regard to documents copied using microfilm and microfiche processes, but denied the request for a waiver regarding documents copied using the imaging process. Specifically, the Order stated:

The drawback to the imaging process is that the information is not easily transportable, because the equipment is very vendor specific and sometimes may not

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even be transportable within the same vendor. While information can be transported rapidly through the use of the network, access to the source documentation through the network may not be available unless an appropriate protocol or conversion process is in place. FPL does not have such a process in place at all its offices, and FPL indicated to our staff that it plans to request a separate waiver of the rule for those documents copied using the imaging process.

In addition, the Order stated:

We are not yet satisfied that there will be dependable, continued access to copies made using this process, and until this concern is addressed, FPL should maintain the original source documents for three years, as Rule 25-6.015 requires.

By letter dated March 29, 1996, FPL renewed its request, insofar as the imaging process is concerned. FPL states that

with experience drawn from widespread usage of the imaging process and refinements made in it over the past 2½ years, the Commission's earlier stated concerns should now be greatly alleviated if not eliminated.

The audit staff visited the utility to review its records. The utility is imaging the following records:

1. Engineering drawings in the distribution, power generation, and power delivery business units.
2. Business records for the General Counsel business unit (employee records, purchase orders, correspondence, returned checks, fee owned facilities, litigation support, insurance policies)
3. Procedures for the nuclear business unit.

These records are imaged using three different systems: Integraph, Universal systems, and Cimage. The database is backed up to ADSTAR Distributed Storage Manager which stores the records in a universal format that can be accessed by any system. The information can be viewed by on-line access, electronic mail, and computer-output-microfiche. The staff reviewed printouts of documents from each system as well as reviewed the documents on-line. All were clear and easy to read.

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Because the records are now stored in a universal format, we believe that the concerns raised in the last proceeding have been eliminated. Therefore, we recommend the utility's request for waiver be granted.

Because the 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 utility makes a change in vendors, or some other part of the process. Therefore, we recommend that the utility notify the Division of Auditing and Financial Analysis if it changes the method used to copy its source documents.

ISSUE 2: Should this docket be closed?

RECOMMENDATION: Yes. If no substantially affected person files a protest within twenty-one days of the date of this order, this docket should be closed. (WAGNER)

STAFF ANALYSIS: If no person, whose substantial interests are affected by this proposed agency action, files a timely request for a hearing within twenty-one days, no further action will be required and this docket should be closed.