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May 3, 2006

- VIA ELECTRONIC DELIVERY -

Ms. Blanca S. Bayó, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Re: Docket Nos. 060172-EU and 060173-EU

Dear Ms. Bayó:

At the April 17, 2006 rule development workshop in the above dockets, Staff requested comments on how Rules 25-6.034, 25-6.0345, 25-6.064, 25-6.078 and 25-6.115, F.A.C, should be amended to facilitate and encourage "storm hardening" of electric utility transmission and distribution facilities. Pursuant to that request, I am enclosing for filing in the above dockets the comments of Florida Power & Light Company, which are in the form of proposed rule amendments. For convenient reference, both redlined and clean versions of the proposed rule amendments are enclosed.

Please note that the redlined version shows proposed changes from the existing rules rather than from the preliminary rule amendment proposals that Staff circulated at the April 17 workshop. FPL's proposed amendments incorporate many of Staff's preliminary proposals, but also address the issues and concerns that FPL expressed at the workshop.

Proposed subsections (8) through (13) of Rule 25-6.034 address attachments by others to electric poles, which FPL briefly discussed at the workshop and which is the subject of FPL's petition for emergency rule or, alternatively, declaratory statement in Docket No. 060355-EI. These amendments are also addressed in separate supplemental rule comments being filed jointly by Tampa Electric Company, FPL, Gulf Power Company and Progress Energy Florida.

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FPL looks forward to the opportunity to discuss its proposed rule amendments with Staff and interested persons at the May 19 rule development workshop.

John T. Butler

Enclosure

Lawrence Harris, Esq. (w/encl.) Cc:

Interested persons (w/encl.)