FPL GROUP.

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

VIA Email

August 11, 2009

Mr. Russell G. Golden
Director of Technical Application and Implementation Activities
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

RE: Draft Abstracts EITF Issue 08-1, "Revenue Arrangements with Multiple Deliverables" and Issue 09-3, "Applicability of AICPA Statement of Position 97-2 to Certain Arrangements That Contain Software Elements"
(File Reference No. EITF0801&0903)

Dear Mr. Golden:

FPL Group, Inc. ("we" or "the Company") appreciates the opportunity to comment on the draft abstracts for EITF Issues 08-01 and 09-03. 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 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 appreciate the efforts of the Task Force and believe the resulting guidance will significantly improve financial reporting for multiple element revenue arrangements. While we generally support the conclusions reached by the EITF, we would like the Task Force to consider our comments on the proposed disclosure requirements.

We discuss the basis for our views below.

Question 6 – Disclosure of revenue recognized in accordance with current and proposed accounting literature

The consensus-for-exposure requires an entity to disclose in the year Issue 08-1 and/or Issue 09-3 are adopted, the amount of revenue recognized under those Issues and the amount of revenue that would have been recognized had the entity applied Issue 00-21 and/or SOP 97-2. The Task Force believes that this information is necessary to describe the affect of the adoption of these issues to financial statement users. Do you agree with that decision?

No, the Company does not agree with that decision.

The recommendation of the Task Force will require companies to track the accounting for multiple element revenue arrangements under the current as well as the proposed accounting literature. Furthermore, it will require system processes and controls for the accounting of these transactions under both sets of literature. This could be very costly.

Additionally, we do not believe that this would be meaningful information to the users of the financial statements, considering the fact that, as mentioned in the draft abstracts, investors and preparers do not believe that the current accounting for arrangements with multiple deliverables best reflects the underlying economics of a transaction.

Other

On page 3 and 4 of the draft abstract, references are made to higher-level literature. We were under the impression that this concept was eliminated with ASC 105-10, *The FASB Accounting Standards Codification and Hierarchy of Generally Accepted Accounting Principles* (FAS 168). The Task Force may need to reconsider how to address this – either specify when to follow other generally accepted accounting principles ("GAAP") or state to follow the guidance in this abstract, unless other GAAP specifically addresses it.

Summary

We support the Task Force's proposal to improve the financial reporting for multiple-deliverable revenue arrangements to best reflect the underlying economics of a transaction. However, we ask for consideration of our comments on the proposed disclosure requirement noted above. Thank you for the opportunity to comment on the draft abstracts. Your consideration of our comments is greatly appreciated.

Sincerely,

K. Michael Davis
Controller and Chief Accounting Officer