



August 19, 2010

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Luis A. Aguilar
Commissioner
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Proposed Rule: Facilitating Shareholder Director Nominations ("Proxy Access")

Dear Commissioner Aguilar:

This letter is submitted on behalf of NextEra Energy, Inc. ("NextEra Energy" or the "Company"), which is a public company with annual revenues in 2009 of more than \$15 billion that is nationally known as a high-quality, efficient, and customer-driven organization focused on energy-related products and services. NextEra Energy has approximately 15,000 employees and over 200,000 shareholders (registered and beneficial). NextEra Energy is proud of its commitment to corporate governance. GovernanceMetrics International has recently identified the Company as one of the 20 U.S. companies in its database (which includes more than 4,100 companies) with the best corporate governance scores. Ethisphere has named the Company among the World's Most Ethical Companies for four consecutive years, Fortune has named NextEra Energy as industry champion on its Most Admired Companies list for four consecutive years and the Company is a member of the Business Ethics Leadership Alliance.

NextEra Energy submitted a comment letter in August 2009 (under the Company's former name, FPL Group, Inc.) on the proposed Proxy Access rule. This letter is written to confirm to you our continuing belief that Proxy Access is not in the best interest of long-term shareholders and could disrupt the economic recovery.

- NextEra Energy believes that Proxy Access will be employed most frequently by short-term investors and will encourage companies to focus on the short-term. This could exacerbate the short-term focus that is widely considered to be a contributing factor to the financial crisis. The prospect of frequent director election contests could lead companies to focus on short-term stock price, rather than on the creation of long-term shareholder value.

- NextEra Energy also believes that frequent proxy contests will be time consuming and will divert company resources. An increased number of proxy contests would create significant costs and distract management and board attention from the creation of long-term shareholder value. NextEra Energy believes that the Securities and Exchange Commission (the "Commission") has significantly underestimated the costs and resources necessary for companies to implement a Proxy Access. Importantly, Proxy Access could discourage qualified people from serving as corporate directors, as they will not want to engage in political campaigns.

If the Commission nevertheless moves forward to implement Proxy Access, NextEra Energy believes that it must adopt a workable process that serves the interests of mainstream investors, not just special interests. In this regard, NextEra Energy urges the Commission to adopt a 5% ownership threshold and two year net long holding requirement:

- Setting a lower ownership threshold would allow special interest groups to aggregate their shares to pursue their own narrow agendas, rather than support the creation of long-term shareholder value.
- Critics of a 5% threshold ignore the concentration of ownership at the largest companies in the United States. NextEra Energy understand that, for example, at the fifty largest companies, the top ten shareholders hold, on average, 27% of the outstanding shares.
- Only shareholders that have a long-term economic interest in a company should be able to nominate directors using Proxy Access. In this regard, shareholders should not be allowed to cheaply borrow shares to meet the eligibility threshold to nominate candidates. The Commission has articulated that one of the principles behind proxy access is that shareholders should be able "to meaningfully exercise their rights to vote for and nominate directors of the companies *in which they invest*." It would undermine this principle to allow persons who do not have an economic investment in a company to hijack the nominations process.

Thank you for taking the time to consider the views of NextEra Energy on this important subject.

Very truly yours,



Alissa E. Ballot
Vice President & Corporate Secretary