



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

August 24, 2022

Matthew Geekie
Senior Vice President
GRAYBAR ELECTRIC CO INC
34 North Meramec Avenue
St. Louis, Missouri 63105

Re: GRAYBAR ELECTRIC CO INC
Registration Statement on Form S-1
Filed on August 18, 2022
File No. 333-266956

Dear Mr. Geekie:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Janice Adeloyle at 202-551-3034 or Erin Jaskot at 202-551-3442 with any questions.

Sincerely,

Division of Corporation Finance
Office of Trade & Services