



Peter Franchot
Comptroller

September 20, 2007

4-547

John W. White, Director
Division of Corporation Finance
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Dear Mr. White:

I understand that a group of State officials and environmental organizations filed a petition on September 18, 2007, requesting the Commission issue interpretive guidance clarifying registrants' obligation under existing regulations to disclose material information concerning the effect of climate change and regulation of greenhouse gas emissions upon their financial condition and business operations. I would like to join as a co-signatory of this petition and ask that you add my name to it.

I am also requesting that the Division of Corporation Finance, when reviewing registrants' 10K and 10Q filings, devote particular attention to the adequacy, under existing regulations, of disclosures concerning climate risk, in light of the circumstances identified in the petition and in the accompanying letter from the petition co-signors.

Recent comprehensive reviews of corporate climate risk disclosure demonstrate that they have been inconsistent and in many cases inadequate. Many registrants include little or no climate risk information in their periodic reporting. In some cases, disclosures have been inadequate or nonexistent even within industries recognized to be distinctly at risk from climate change or from regulation of greenhouse gas emissions.

In Maryland, a new Commission on Climate Change has been established which reports to the Governor and General Assembly annually. It is charged with developing a comprehensive strategy for reducing Maryland's climate change vulnerability and a plan of action to be updated annually. More specific information from corporate climate risk disclosures is important for our understanding of the projected vulnerabilities of Maryland from climate change impacts.

John W. White, Director
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Thank you for your consideration of this important issue and for adding my name to the petition.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Franchot". The signature is written in a cursive, flowing style with a large initial "P" and a long, sweeping underline.

Peter Franchot

PF:dw