



American  
Petroleum  
Institute

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April 12, 2022

Ms. Vanessa A. Countryman  
Secretary, Securities and Exchange Commission  
100 F Street NE, Washington, DC 20549-1090

ATTN: File No. S7-10-22

**Comment Period Extension Request on the Request for Comments to the Proposed Rule on Enhancement and Standardization of Climate-Related Disclosures for Investors**

Dear Ms. Countryman,

The American Petroleum Institute (API) requests at least a 30-day extension to the current 60-day public comment period for Proposed Rule on Enhancement and Standardization of Climate-Related Disclosures for Investors (File No. S7-10-22).

API is the only national trade association representing all facets of the oil and natural gas industry, which supports 10.3 million U.S. jobs and nearly 8 percent of the U.S. economy. API's membership includes large integrated companies as well as exploration and production, refining, marketing, pipeline, and marine businesses, and service and supply firms. API is requesting this comment period extension to gather information from members to fully understand the proposal and potential impacts across the oil and gas value chain from such a significant addition to an issuer's filing requirement as well as compile adequate responses to the proposal. This is no small undertaking due to the breadth of API's membership and potential scope of the proposed rule.

We would note that the Commission provided a 90-day comment period on its initial request for public input on climate-related disclosures, which was much higher level in scope, and that it took the Commission nine months to craft and propose a rule. Given that the proposed rule is incredibly complex and poses over 200 questions, many of which are technical in nature, the Commission would be well-served to provide opportunity for robust feedback from the public and API on behalf of its member issuers. This is especially true in light of the other significant proposed rules for which the Securities & Exchange Commission has recently requested comment and to which API also plans to respond. We appreciate the consideration of this request and ask for an expeditious response.

Sincerely,

Stephen Comstock  
Vice President, Corporate Policy