



Edison Electric
INSTITUTE

Power by Association™

August 24, 2016

Brent J. Fields, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

File No. S7-15-16
Proposed Rule: Disclosure Update and Simplification

Dear Mr. Fields:

The Edison Electric Institute (EEI) respectfully requests that the comment deadline be extended to 90 days for the Securities and Exchange Commission's (Commission) Proposed Rule, *Disclosure Update and Simplification*, File No. S7-15-16.

EEI is the association that represents all U.S. investor-owned electric companies. EEI members provide electricity for 220 million Americans, operate in all 50 states and the District of Columbia, and directly and indirectly create jobs for more than one million Americans. With more than \$100 billion in annual capital expenditures, the electric power industry is responsible for millions of additional jobs. EEI has dozens of international electric companies as International Members and hundreds of industry suppliers and related organizations as Associate Members. Organized in 1933, EEI provides public policy leadership, strategic business intelligence, and essential conferences and forums.

EEI applauds the Commission's objective of addressing disclosure requirements that may have become redundant, duplicative, overlapping, outdated, or superseded, as well as other requirements that overlap with, but require information incremental to, U.S. GAAP. We support this and other aspects of the initiative by the Division of Corporation Finance to consider ways to improve the Commission's disclosure requirements for the benefit of investors and issuers.

We have reviewed the Proposed Rule and believe that more time is needed in order to analyze it thoroughly and provide relevant, helpful comments. Many aspects of the proposal could impact our members, and the portions of the proposal seeking feedback on requirements that overlap with, but are incremental to, U.S. GAAP in particular will require thoughtful consideration.

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A 90 day comment period would be consistent with the comment period for the Commission's recent *Request for Comment on Business and Financial Disclosure Requirements in Regulation S-K*. It would also take into account both the time of year during which the proposal was issued as well as the fact that many registrants are also evaluating several Exposure Drafts previously issued by the FASB with comment periods ending during the same time frame.

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EEI appreciates the opportunity to comment on this important proposal and your timely consideration of our request for an extension of the comment period.

Very truly yours,

/s/ Richard F. McMahon, Jr.

Richard F. McMahon, Jr.
Vice President