



AMERICAN PUBLIC GAS ASSOCIATION

May 2, 2022

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

Submitted via email to rule-comments@sec.gov

Re: Request for Extension of Comment Period for Proposed Rule Regarding “The Enhancement and Standardization of Climate-Related Disclosures for Investors” [File Number S7-10-22]

Dear Ms. Countryman:

The American Public Gas Association (“APGA”) respectfully requests that the Securities and Exchange Commission (“SEC”) extend the public comment period in the above-referenced proceeding by 60 days. The SEC’s Proposed Rule regarding “The Enhancement and Standardization of Climate-Related Disclosures for Investors” (“Proposed Rule”) is a complex rulemaking with the potential to impact many entities not directly regulated by the SEC, including APGA members. Accordingly, we request a 60-day extension to the comment period to allow for sufficient time to appropriately analyze and comment on these impacts.

APGA is the trade association for more than 730 communities across the U.S. that own and operate their retail natural gas distribution entities. They include not-for-profit gas distribution systems owned by municipalities and other local government entities, all locally accountable to the citizens they serve. Public gas systems focus on providing safe, reliable, and affordable energy to their customers and support their communities by delivering fuel to be used for cooking, clothes drying, and space and water heating, as well as for various commercial and industrial applications, including electricity generation.¹

While the SEC’s Proposed Rule does not directly impose new requirements on APGA members, APGA believes an extension to the comment period is warranted so that our members can properly assess and comment on how the Proposed Rule will impact community-owned natural gas utilities. For instance, the burden of reporting requirements for SEC-regulated energy companies arising from the Proposed Rule is expected to be high. APGA members conduct business with SEC-regulated companies and anticipate that any additional costs from robust, new reporting requirements will be passed on to APGA members through higher costs in goods (including natural gas) and services. Because APGA’s members operate as non-for-profits and must pass reasonable costs onto their customers through natural gas rates set by the communities that govern them, these costs will ultimately be borne by American families and business-owners in the form of higher energy costs.

¹ For more information, please visit www.apga.org.

Additionally, the Proposed Rule considers the reporting of Scope 3 greenhouse gas emissions in certain instances – which, for some upstream SEC-regulated companies, would include APGA member system emissions. APGA and its members require additional time to sufficiently understand how such broad reporting requirements will impact their own reporting requirements and business relationships with upstream, SEC-regulated companies. An extension of the comment period by 60 days will provide needed time to appropriately analyze these and other potential impacts from the Proposed Rule so that APGA can develop meaningful comments on this complex and important rulemaking.

Thank you for the review and consideration of this request. If you have any questions regarding this submission, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in blue ink that reads "Dave Schryver". The signature is written in a cursive, flowing style.

Dave Schryver
President & CEO
American Public Gas Association