Ms. Vanessa Countryman
Secretary
Securities and Exchange
Commission 100 F Street N.E.
Washington, D.C. 20549

Re: File No. S7-10-22: The Enhancement and Standardization of Climate-Related Disclosures for Investors

Dear Ms. Countryman,

Decatur Capital Management, Inc. (Decatur) welcomes the opportunity to respond on File No. S7-10-22: The Enhancement and Standardization of Climate-Related Disclosures for Investors ("Proposed Rule"). We commend the Commission for its Proposed Rule aimed at providing investors with climate-related financial information from issuers of public securities.

Decatur was founded in 2000 by two Army veterans and began institutional asset management in 2002. Decatur is a registered investment advisor that embodies diversity as a 100% employee owned minority firm. The firm strives to provide relevant investment solutions and service that exceed client expectations. Decatur works through our purpose, process, and people to select sustainable companies while being servant leaders in the community. In addition to serving the community, Decatur engages with local colleges and universities to provide internships. Since 2017, Decatur has been a signatory to the Principles for Responsible Investment (PRI).

The Commission's Proposed Rule marks a change in the quality and comparability of climate disclosures that is essential to an efficient market response to climate change and ESG- related risks. While most companies report sustainability information in some form, the content and type of disclosures vary significantly. To better interpret and utilize climate-related information, consistent, reliable and comparable disclosures by companies are a top priority for investors. In the absence of standardized disclosures, investors seeking climate-related information have had to collect this data from numerous sources, including companies' voluntary disclosures that are unverified and often difficult to compare.

Therefore, we support the SEC's Proposed Rule requiring all public companies to file climate-related financial information with the Commission, to have this information appear alongside financial information, and to present narrative and quantitative information in XBRL tagged form. This will make climate-related financial information more useful to investors seeking to understand the risks and opportunities presented by climate change.

The Proposal's alignment with recommendations by the TCFD (Taskforce on Climate-Related Financial Disclosures) and the Greenhouse Gas Protocol ensures market efficiencies, a key focus for investors. The TCFD recommendations are widely used across the largest capital markets, with 2,600 supporters globally. Furthermore, regulators have begun mandating TCFD-aligned reporting in the UK, Brazil, the EU, Hong Kong, Japan, New Zealand, Singapore, and Switzerland.

The IFRS Foundation, which sets accounting standards used in over 140 nations, recently released its own proposal for climate-related disclosures via its International Sustainability Standards Board (ISSB). The ISSB proposal similarly uses the TCFD recommendations as a baseline and has significant similarities to the SEC's proposal.

Coherence with future ISSB standards will reduce the burden of compliance on issuers as many of the largest US issuers are global companies and will likely fall under the disclosure requirements of a jurisdiction following ISSB standards. Furthermore, globally coherent disclosure requirements will lead to better comparability of data for investors.

The SEC's decision to mandate climate-related financial disclosures by US public companies will help companies prepare and plan for the transition to a low-carbon economy and protect investors and US competitiveness in the economies of the future. It is important for investors to understand how companies are managing climate risks and following through on public statements via action towards set goals. The Proposed Rule also includes safe harbor provisions for forward- looking information and Scope 3 emissions, and a reporting phase-in period based on the registrant's filer status, which aims to address issuers' concerns about compliance. The Proposed Rule could also ease the burden on companies that are currently providing this information in numerous formats in response to various investor questionnaires on climate information and shareholder proposals calling for this information.

In our opinion, the Proposed Rule strikes the right balance between investors' needs for climate- related information and issuers' ability to collect and report this information.

Response to Request for Comment on selected questions

2: If adopted, how will investors utilize the disclosures contemplated in this release to assess climate- related risks? How will investors use the information to assess the physical effects and related financial impacts from climate-related events? How will investors use the information to assess risks associated with a transition to a lower carbon economy?

Decatur will have more confidence determining materiality of climate- related risk.

60: Would the impact from climate-related events and transition activities yield decision-useful information for investors?

Yes, the climate-related events and transition activities provides material decision useful information. One example, Decatur evaluates a firm's carbon intensity and free cash yield to determine potential impact on increasing carbon regulations.

81: Should we require disclosure of financial estimates and assumptions impacted by the climate- related events and transition activities (including disclosed targets), as proposed? How would investors use this information?

Yes, investors will be able to evaluate climate-related events and transition activities and how it impacts future cash flows as they determine appropriate valuation *multiples.*

93. How would investors use GHG emissions disclosures to inform their investment and voting decisions? How would such disclosures provide insight into a registrant's financial condition, changes in financial condition, and results of operations? How would such disclosures help investors evaluate an issuer's climate risk-related exposure? Would such disclosures enable investors to better assess physical risks associated with climate-related events, transition risks, or both types of risks?

Investors will be able to use the GHG emissions disclosures to determine the impact on future cash flows relative to physical risks and transitional risk through the use of carbon tax assumptions.

For further discussion or questions, please contact:
Degas Wright, CFA
[redacted]

Sincerely,

Degas A. Wright

Degas Wright, CFA
Chief Executive Officer