



June 16, 2022
Via Electronic Submission

Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549

Re: The Enhancement and Standardization of Climate-Related Disclosures for Investors - Release Nos. 33-11042; 34-94478; File No. S7-10-22

Dear Chair Gensler,

Clearloop is a Tennessee-based climate tech company that partners with companies of all sizes to meet ambitious net-zero and ESG goals by reclaiming their carbon footprint, expanding access to clean energy, and cleaning up the grid through the construction of new solar projects in American communities otherwise getting left behind.

Clearloop uses solar nameplate capacity (measured in watts) as the mechanism to reclaim the carbon emissions from the grid. That means that when corporate climate leaders partner with Clearloop to meet their net-zero and ESG goals, they're helping to build brand new solar farms and spur economic investment in communities across the country. We're shifting the way corporate investments reduce carbon by bringing solar projects to regions of the country with disproportionately carbon-intense electricity generation. We believe doing things this way will achieve deeper, and faster emissions reductions. It will also bring good-paying clean energy jobs and catalyze investments in regions of the country that vitally need them. Clearloop, which was recently acquired by Silicon Ranch, one of the largest American Independent Power Producers, is doubling down on its founding mission to ensure that the innovation and benefits of new clean energy investments reach all communities around our country equally, starting in our own backyard with economically-distressed communities most in need of access to clean energy.

Clearloop, like many others in the growing decarbonization solutions space, supports the Commission's objectives to help investors access consistent, transparent, and forward-looking climate-related information. We further support alignment and collaboration with existing GHG Accounting programs and frameworks like the GHG Protocol and the Taskforce on Climate Related Financial Disclosure that will give investors access to information on climate risks, greenhouse gas emissions, and climate solutions.

Clearloop is particularly supportive of elevating forward-looking perspectives on climate risk and climate risk mitigation. We believe greater transparency around the science and demonstrable impact of private sector climate action is imperative to reaching our country's climate goals. We believe that the current mitigation options available to the broadest number of corporations in the United States rely too heavily on attributional GHG accounting that indirectly drive decarbonization. We encourage the Commission to embrace

consequential GHG accounting, as embodied in renewable energy Emissionality¹. We also encourage the Commission to embrace innovative direct investment and crediting structures that allow companies of all sizes to access the highest quality GHG emissions mitigation options in the United States.

Clearloop respectfully encourages the Commission to recognize the critical importance of grid decarbonization in mitigating climate risk for corporations. Providing clear pathways for corporations to acknowledge outside their four walls the consequential GHG emissions reductions of their ESG investments will benefit both corporations and their shareholders.

The US utility electric grid represents the greatest near-term opportunity to reduce significant GHG emissions in our economy. The US electric grid and the transportation sector each account for around a quarter of GHG emissions in the United States. While strides are being made to decarbonize the transportation sector, current EV technologies will likely shift a significant amount of GHG emissions to the grid.

The only way to ensure permanent GHG reductions and greater grid resilience is to install more zero-carbon generating capacity across the United States. Providing more pathways for companies of all sizes to support new renewable capacity development and acknowledge it as a part of their ESG reporting is vital.

Clearloop and its partners and customers seek to achieve the highest environmental, economic, and social impact through new solar development in deserving communities across the United States and to spur deep decarbonization of the US electric grid as a result. Clearloop supports the objectives of the Commission's proposed rule and appreciates the opportunity to provide comment.

Respectfully,

A handwritten signature in black ink, appearing to read "Laura J. Zapata".

Laura J. Zapata
Chief Executive Officer
Clearloop Corporation

¹ Emissionality is a quantitative measurement that compares the impact of renewable energy projects on driving down emissions. Due to the uneven distribution of clean energy in the United States, where a renewable energy project is built has a large influence over how much carbon it is reducing, or directly replacing.