



**THE CLIMATE
REGISTRY**

June 17, 2022

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

File Number S7-10-22

Dear Ms. Countryman:

The Climate Registry (TCR) appreciates this opportunity to respond to the U.S. Securities and Exchange Commission's (SEC) request for public comment on its proposed amended rule changes for the Enhancement and Standardization of Climate-Related Disclosures for Investors, referred to herein as the "proposed rule". As a non-profit organization committed to providing greenhouse gas (GHG) emissions reporting, TCR commends the SEC for undertaking an effort to ensure that investors are well informed about the climate related risks associated with current and potential investments, particularly as they relate to GHG emissions.

While the proposed rule would expand the volume of publicly traded companies disclosing GHG emissions and create requirements for how this information is measured and reported, it builds upon precedents set by companies who voluntarily report annual GHG emissions to TCR's Carbon Footprint Registry and use verified inventory reports to inform publicly available sustainability strategies, plans, and progress toward targets. In addition, the proposed rule's use of the Greenhouse Gas Protocol for the reporting framework will allow for excellent compatibility with GHG emissions reported using TCR's General Reporting Protocol which is aligned with the Greenhouse Gas Protocol.

The GHG emissions registry developed and operated by TCR was launched in 2001 under the direction of the California State Legislature to ensure the consistent measurement, reporting, and verification of greenhouse gas emissions from entities across North America. The latest version, called the Carbon Footprint Registry, is the product of over two decades of development and refinement that reflect an evolving climate policy landscape, user feedback, and incorporation of rigorous standards for measurement and verification established by groups such as the International Standards Organization (ISO) and American National Standards Institute (ANSI). Reporting members include publicly traded corporations as well as many public entities such as state agencies, universities, utilities, special districts, and local governments – some of whom use verified annual inventories to demonstrate compliance with regulations, executive orders, or other government mandates.

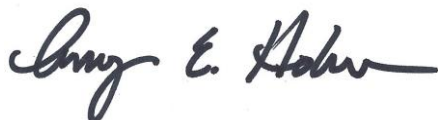
TCR's Carbon Footprint Registry has and will continue to adapt to serve members in response to regulatory changes, including those contemplated by SEC through this rule. Our existing process for GHG emissions

accounting is well positioned to meet the aggressive timeline for disclosing corporate emissions inventories with reasonable levels of assurance. The Registry currently has the capacity to publicly disclose verified emissions inventories through public facing links on our website. It can additionally take in information on Scope 3 emissions, including those that may be deemed to be material or relevant to a target as specified for disclosure under the proposed rule. For quality assurance our team reviews submitted verification statements, emissions reports, and supporting documents to ensure that protocols and program requirements are being met for publication.

The disclosure of GHG emissions data can also be used by companies to show progress toward mitigation targets, including net-zero GHG emissions. TCR is currently developing the Net-Zero Portal - a free, online database that will be designed to track net-zero GHG pledges and performance from public and private entities. Created with input from over 60 international stakeholders, the Portal will provide a resource for organizations to understand the full landscape of net-zero commitments and provide the data needed to establish common definitions, approaches, and methods employed to reach this aggressive target. The Net-Zero Portal is scheduled for launch in Fall 2022.

In summary, the GHG accounting system and programs developed and operated by TCR are aligned with the intent of this proposed rule and we plan to continue supporting organizations with disseminating information on operational GHG emissions either voluntarily or for compliance with the rules included in the final version of this proposal.

Sincerely,

A handwritten signature in black ink that reads "Amy E. Holm". The signature is fluid and cursive, with a long horizontal stroke at the end.

Amy Holm
Executive Director
The Climate Registry