



**Comments on U.S. Securities and Exchange Commission Proposed Rule S7-10-22: The Enhancement and Standardization of Climate-Related Disclosures for Investors**

**Capital Research Center**

**Washington, DC**

Dear Sir or Madam,

The Capital Research Center (CRC) is submitting as a public comment a copy of its InfluenceWatch profile of Persefoni. CRC monitors the relationship between government and special interests and seeks to highlight the influence such interests may have had on proposed rule S7-10-22: The Enhancement and Standardization of Climate-Related Disclosures for Investors.

InfluenceWatch is a product of the Capital Research Center, and the profile of Persefoni reproduced in this comment letter reflects the content of that profile as of September 27, 2023. The profile is available online at: <https://www.influencewatch.org/for-profit/persefoni/>

Thank you for your consideration of this comment.

# Persefoni

---

Persefoni is a for-profit company that specializes in providing carbon-emissions measurement and reporting software for businesses. It has been noted for having close connections to the U.S. Securities and Exchange Commission (<https://www.influencewatch.org/government-agency/securities-and-exchange-commission/>) (SEC), specifically with respect to a rule that the agency proposed in 2022 that would require companies to make various climate-related disclosures, including information about their carbon emissions. Persefoni has also hired multiple former high-ranking SEC personnel who were directly involved with the proposed rule or the issue of corporate climate disclosures more broadly.

## Operations

---

Persefoni is a for-profit company that offers carbon-emissions measurement and reporting software for businesses. It asserts that its products help customers determine their “accurate carbon footprint,” create the reports necessary to meet regulatory requirements, and “embrace the decarbonization era” to meet net-zero emissions standards. <sup>1</sup> Persefoni’s chief sustainability officer has described the company as the “TurboTax of greenhouse gas reporting.” <sup>2</sup>

Persefoni was founded in 2020, and as of April 2022, was reported to have more than 240 employees. <sup>3</sup> Its customers include Citigroup, Elevance Health/Anthem, Burlington, Xerox, Dropbox, Einstein Bros. Bagels, At Home, Hitachi, Virgin Australia, Aramark, and Bain and Company. <sup>4</sup>

Persefoni has offices located throughout the world, including in Germany, Japan, Singapore, the United Kingdom, and Canada. Its United States office is in Mesa, Arizona. <sup>5</sup>

## Relationship with the U.S. Securities and Exchange Commission

---

Persefoni’s relationship with the U.S. Securities and Exchange Commission (<https://www.influencewatch.org/government-agency/securities-and-exchange-commission/>) (SEC) has attracted attention, specifically regarding the agency’s 2022 proposed rule requiring companies to make certain climate-related disclosures. Observers have noted that Persefoni worked to support the SEC’s rulemaking on those disclosures while simultaneously standing to profit from the rule’s promulgation. <sup>6</sup> In addition, Persefoni subsequently hired several former high-ranking SEC officials who worked on the rule itself and/or the issue of corporate climate disclosures. <sup>7</sup> Persefoni has not been accused of any legal wrongdoing.

### CONNECTIONS TO THE 2022 CLIMATE DISCLOSURE RULE

In March 2022, the SEC proposed a new rule that would broadly require companies to make multiple climate-related disclosures, including information about carbon emissions and any climate risks that the companies face. In the proposed rule, the SEC estimated that the cost of complying with its provisions for large companies would be \$640,000 in the first year and \$530,000 in subsequent years. For smaller companies, the agency estimated that costs would be \$490,000 in the first year and \$420,000 in subsequent years. <sup>8 9 10</sup>

After the rule was proposed, commentators noted that some of the biggest “winners” would be companies that offer carbon accounting and reporting services. Persefoni was identified as one such business, and its chief executive officer Kentaro Kawamori remarked that “companies like us—you will have one or two big winners—will create a system of record for the carbon accounting piece.” He characterized the situation as one with the potential for a “Salesforce-type of success.” <sup>11</sup>

Axios described the proposed rule as a potential “windfall for enterprise companies that track emissions as a service” and speculated that “paying for specialty software may be the easiest and cheapest way [for companies] to stay on the SEC’s good side.” It noted that Persefoni was one company offering such software.<sup>12</sup>

An op-ed published in the *Washington Examiner* argued that Persefoni was “betting on the mandatory disclosures in the rule to catapult its business.”<sup>13</sup>

Persefoni worked with the SEC on the proposed rule.<sup>14</sup> Freedom of Information Act (FOIA) materials obtained by Energy Policy Advocates revealed that individuals from Persefoni and the environmental activist group Ceres (<https://www.influencewatch.org/non-profit/ceres/>) communicated with SEC staff in late 2021 to help the agency determine what the cost of complying with the rule would be for companies. Jim Coburn of Ceres explained in November 2021 that the SEC had “received very little info” about the costs associated with preparing climate disclosures, and that such information would be very useful to the agency “if this exists.” Coburn also noted that while “Ceres and two partners” were going to commission the ESG (<https://www.influencewatch.org/hub/esg-activism/>) consulting firm ERM to conduct a study on the issue in the coming months, the SEC was in immediate need of data.<sup>15</sup>

Executives at Persefoni provided material on carbon-disclosure costs to the SEC and responded to specific requests from the agency. In December 2021, Persefoni emailed a “formal submission” on the topic to the SEC, which it had based on prior conversations with agency personnel and related follow-up questions. The lobbying firm Boundary Stone Partners also promoted Persefoni and its software products to the SEC around this time.<sup>16</sup>

SEC staff participated in a teleconference with Persefoni executives on September 14, November 23, and November 30, 2021. During those calls, Persefoni demonstrated its emissions accounting software products and discussed the costs companies would incur by using those products. It also provided “estimated ranges of costs based on their experience working with corporations that voluntarily initiate a [greenhouse-gas] emissions disclosure program.”<sup>17</sup>

Soon after the rule was proposed in March 2022, Kawamori wrote an open letter to America’s corporate leadership, saying that “Persefoni is ready to help you simplify this complexity and measure your carbon footprint accurately and reliably so you can comply with the SEC rules, easily disclose to your diverse stakeholders, and stay ahead of additional changes in regulations and standards.”<sup>18</sup> In April 2022, he wrote another open letter, stating that the SEC’s estimated costs for compliance with the rule were consistent with “Persefoni’s own experts and engagements with clients around the world.”<sup>19</sup>

In May 2022, Persefoni submitted a public comment on the proposed rule to the SEC, which contained a report on the results of a survey of corporations and institutional investors that had been conducted from February to March 2022. Persefoni and Ceres had jointly commissioned the survey, which was conducted by the ESG consulting firm ERM.<sup>20</sup> The report found that “corporate issuers currently spend \$533,000 per year on climate-related disclosure activities that would be required by the SEC’s proposed rule. This suggests the SEC’s estimated costs closely align with corporate issuers’ current average spend and reflect a realistic assessment of market practices.”<sup>21</sup> In June 2022, representatives from Ceres, Persefoni, and ERM met with SEC staff members to discuss the survey and report.<sup>22</sup>

In April 2023, Persefoni and Ceres submitted another public comment to the SEC to provide more information about the ERM survey and report regarding the cost of the proposed rule for companies and to “counter arguments suggesting higher costs for implementation of the rule than the SEC suggests”—specifically those of the American Petroleum Institute (<https://www.influencewatch.org/non-profit/american-petroleum-institute/>), the Business Roundtable (<https://www.influencewatch.org/non-profit/business-roundtable/>), and the U.S. Chamber of Commerce (<https://www.influencewatch.org/non-profit/chamber-of-commerce-of-the-united-states-of-america/>).<sup>23</sup> The American Petroleum Institute claimed that “the cost of complying with the Proposal will be tremendous,” as much as \$100 million for certain companies.<sup>24</sup> The Business Roundtable wrote that the SEC’s estimated compliance costs were “severely underestimated and do not reflect the actual costs companies would incur since they appear to be based on various example disclosures...that are far less extensive and prepared on a different schedule than the many new mandates in the proposed rule.”<sup>25</sup> The U.S. Chamber of Commerce wrote that the SEC’s economic analysis in the rule “substantially underestimates compliance costs” associated with it.

Multiple commentators noted the connection between the SEC's cost estimates and Persefoni. The right-leaning Consumers' Research (<https://www.influencewatch.org/non-profit/consumers-research/>) wrote that "collaboration between Ceres and Persefoni appears to have led to a cost of compliance study reflecting a similar estimate to the SEC's proposal."<sup>27</sup>

Matthew Winden, associate professor at the University of Wisconsin-Whitewater, wrote in *The Hill* that "The SEC's [cost] estimate appears to be most aligned with a study commissioned by environmental organization Ceres and carbon accounting startup Persefoni (which appear likely to benefit from the rule by providing climate data to firms)." Winden also remarked that the SEC's estimate was lower than his own and others' and argued that the broader costs to the economy from the rule's implementation would be far higher.<sup>28</sup>

Dan Eberhart, CEO of the oilfield services company Canary LLC, pointed to the FOIA documents obtained by Energy Policy Advocates while writing in *Forbes* that "the SEC communicated the concept of an external cost of compliance study with Ceres and Persefoni while the rulemaking was in its early stages." Eberhart wrote that "the SEC was aware of the methodology and timeline" of the study prior to proposing the rule, and argued that Ceres and Persefoni had "aggressively positioned their cost study to validate the SEC's estimates."<sup>29</sup>

## **HIRING FORMER SEC PERSONNEL**

At least three former high-ranking SEC officials joined Persefoni in 2022 and 2023, all of whom worked directly on the SEC's climate-disclosure rule and/or the issue of corporate climate disclosures more broadly.

Kristina Wyatt was senior counsel for climate and ESG in the division of corporate finance at the SEC. While there, she worked extensively on the agency's proposed climate-disclosure rule and led the team responsible for drafting it.<sup>30</sup> In March 2021, she was listed as the contact person for members of the public who wished to meet to discuss the issue of corporate climate disclosures with SEC staff.<sup>31</sup> Wyatt joined Persefoni in March 2022 as deputy general counsel and senior vice president of global regulatory climate disclosure,<sup>32</sup> and she was promoted to chief sustainability officer in February 2023.<sup>33</sup>

Emily Pierce was assistant director in the office of international affairs at the SEC, where she had "a specific focus on climate and sustainability disclosure." She joined Persefoni in December 2022 as associate general counsel and vice president of global regulatory climate disclosure, and she was promoted to chief global policy officer in June 2023.<sup>34</sup>

Allison Herren Lee was a commissioner and acting chair of the SEC. While there, she "brought environmental, social, and corporate governance (ESG) issues to the forefront of the agency's agenda, and specifically worked to meet investors' demand for material climate disclosures." Persefoni credits her with having "laid the foundation" for the climate disclosure rule, and the company's chief executive officer Kentaro Kawamori remarked that she "is a global leader in addressing climate risk as financial risk within the public markets; I can think of no one better to advise Persefoni and our clients/partners through upcoming climate disclosure regulation." He added that "the insight and relationships she has formed during her time at the SEC will be vital as we continue to guide our clients on their journey to compliance." Lee joined Persefoni's sustainability advisory board in May 2023,<sup>35</sup> and as of August 2023, was listed as its co-chair.<sup>36</sup>

## **Leadership**

---

Kentaro Kawamori is a co-founder and the chief executive officer of Persefoni. He was formerly the chief data officer at Chesapeake Energy and has also worked as an investor at Rice Investment Group.<sup>37</sup> As of September 2023, he was listed as a partner at Rice Investment Group.<sup>38</sup> In 2020, Kawamori was recognized by *Forbes* as one of its 30 Under 30 for energy.<sup>39</sup>

Jason Offerman is a co-founder, president, and chief operating officer of Persefoni. He has also worked as an advisor at Rice Investment Group.<sup>40</sup>

Kim Stroh is a co-founder and the chief digital information officer of Persefoni.<sup>41</sup>

Kristina Wyatt is chief sustainability officer and deputy general counsel. She previously worked at the SEC (<https://www.influencewatch.org/government-agency/securities-and-exchange-commission/>), where she was senior counsel for climate and ESG (<https://www.influencewatch.org/hub/esg-activism/>) in the division of corporate finance.<sup>42</sup> Wyatt is also a member of Persefoni's sustainability advisory board.<sup>43</sup>

Emily Pierce is chief global policy officer and associate general counsel. She previously worked at the SEC, where she was assistant director in the office of international affairs.<sup>44</sup>

Allison Herren Lee is co-chair of Persefoni's sustainability advisory board. She was an SEC commissioner from 2019 to 2022 and served as the agency's acting chair in 2021.<sup>45</sup>

Robert Eccles is a member and former chair of Persefoni's sustainability advisory board. He is a professor at the University of Oxford's Saïd Business School and was the founding chairman of the Sustainability Accounting Standards Board (<https://www.influencewatch.org/non-profit/sustainability-accounting-standards-board-sasb/>), an organization that establishes voluntary ESG reporting standards.<sup>46</sup> Eccles' personal website describes him as "a leading authority on how companies and investors can create sustainable strategies through the integration of environmental, social, and governance (ESG) factors in resource allocation decisions."<sup>47</sup>

## Financials

---

In April 2021, Persefoni announced that it had raised \$9.7 million in its Series A financing round, bringing the total amount of capital it had raised to \$13.2 million. This included previous investments from Rice Investment Group and Carnrite Ventures.<sup>48</sup>

In October 2021, Persefoni announced that it had raised \$101 million in its Series B financing round. The Series B round was led by Prelude Ventures and the Rise Fund, and other participants included Clearvision Ventures, Parkway Ventures, Bain & Co., EDF Group, Sumitomo Mitsui Banking Corporation, the Ferrante Group, Alumni Ventures Group, New Valley Ventures, NGP Energy Technology Partners, and Sallyport Investments.<sup>49</sup>

In August 2023, Persefoni announced that it had raised \$50 million in its Series C-1 financing round, bringing the total amount of capital that it had raised to over \$150 million. The Series C-1 funding round was led by TPG Rise, and also included Clearvision Ventures, ENEOS Innovation Partners, NGP Energy Technology Partners, Prelude Ventures, Parkway Ventures, Rice Investment Group, Bain and Co., EDF, and Alumni Ventures.<sup>50</sup>

## References

1. "Persefoni for Business." Persefoni. Accessed August 29, 2023. Available at: <https://www.persefoni.com/product/corporate> (<https://www.persefoni.com/product/corporate>)
2. Avery Ellfeldt. "Companies Race to Count CO2 Ahead of SEC Climate Rule." ClimateWire. April 7, 2022. Available at: <https://www.eenews.net/articles/companies-race-to-count-co2-ahead-of-sec-climate-rule/> (<https://www.eenews.net/articles/companies-race-to-count-co2-ahead-of-sec-climate-rule/>)
3. Avery Ellfeldt. "Companies Race to Count CO2 Ahead of SEC Climate Rule." ClimateWire. April 7, 2022. Available at: <https://www.eenews.net/articles/companies-race-to-count-co2-ahead-of-sec-climate-rule/> (<https://www.eenews.net/articles/companies-race-to-count-co2-ahead-of-sec-climate-rule/>)
4. "Customers." Persefoni. Accessed August 15, 2023. Available at: <https://www.persefoni.com/customers> (<https://www.persefoni.com/customers>)
5. "Contact Us." Persefoni. Accessed September 6, 2023. Available at: <https://www.persefoni.com/contact-us> (<https://www.persefoni.com/contact-us>)
6. Dan Eberhart. "Report Reveals ESG Supports' Campaign to Influence Regulators." Forbes. August 25, 2023. Available at: <https://www.forbes.com/sites/daneberhart/2023/08/25/report-reveals-esg-supports-campaign-to-influence-regulators/?>

sh=5c0cb6b358c6 (<https://www.forbes.com/sites/daneberhart/2023/08/25/report-reveals-esg-supports-campaign-to-influence-regulators/?sh=5c0cb6b358c6>)

7. “The Persefoni Team.” Persefoni. Accessed August 31, 2023. Available at: <https://www.persefoni.com/company/people-and-leadership> (<https://www.persefoni.com/company/people-and-leadership>)
8. “The Enhancement and Standardization of Climate-Related Disclosures for Investors.” RIN 3235-AM87. Securities and Exchange Commission. March 21, 2022. Page 373. Available at: <https://www.sec.gov/rules/proposed/2022/33-11042.pdf> (<https://www.sec.gov/rules/proposed/2022/33-11042.pdf>)
9. “Breaking Down the SEC Climate Proposal: A Focus on GHG Emissions Disclosures.” Persefoni. August 23, 2023. Available at: <https://www.persefoni.com/learn/sec-climate-disclosure-rule-ghg-emissions> (<https://www.persefoni.com/learn/sec-climate-disclosure-rule-ghg-emissions>)
10. Jean Eaglesham and Paul Kiernan. “Fight Brews Over Cost of SEC Climate-Change Rules.” The Wall Street Journal. May 17, 2022. Available at: [https://www.wsj.com/articles/fight-brews-over-cost-of-sec-climate-change-rules-11652779802?mod=article\\_inline](https://www.wsj.com/articles/fight-brews-over-cost-of-sec-climate-change-rules-11652779802?mod=article_inline) ([https://www.wsj.com/articles/fight-brews-over-cost-of-sec-climate-change-rules-11652779802?mod=article\\_inline](https://www.wsj.com/articles/fight-brews-over-cost-of-sec-climate-change-rules-11652779802?mod=article_inline))
11. Catherine Clifford. “Who Stands to Make and Lose Money if the SEC Climate Rule Becomes Law.” CNBC. March 23, 2022. Available at: <https://www.cnbc.com/2022/03/23/sec-climate-rule-winners-and-losers.html> (<https://www.cnbc.com/2022/03/23/sec-climate-rule-winners-and-losers.html>)
12. Megan Hernbroth. “Emissions Trackers Win in SEC’s New Climate Rules.” Axios. March 22, 2022. Available at: <https://www.axios.com/pro/climate-deals/2022/03/22/emissions-trackers-win-sec-disclosure> (<https://www.axios.com/pro/climate-deals/2022/03/22/emissions-trackers-win-sec-disclosure>)
13. Ganon Evans. “The Opaque Revolving Door Behind the SEC’s ESG Policymaking.” Washington Examiner. August 3, 2023. Available at: <https://www.washingtonexaminer.com/restoring-america/faith-freedom-self-reliance/the-opaque-revolving-door-behind-the-secs-esg-policymaking> (<https://www.washingtonexaminer.com/restoring-america/faith-freedom-self-reliance/the-opaque-revolving-door-behind-the-secs-esg-policymaking>)
14. Dan Costa. “Carbon Tracking Fuels a New Business Analytics Boom.” Techonomy. April 7, 2022. Available at: <https://techonomy.com/carbon-tracking-fuels-a-new-business-analytics-boom/> (<https://techonomy.com/carbon-tracking-fuels-a-new-business-analytics-boom/>)
15. “More Disclosure About ‘Climate Risk Disclosure.’” Government Accountability & Oversight. July 13, 2023. Available at: <https://govoversight.org/more-disclosure-about-climate-risk-disclosure/> (<https://govoversight.org/more-disclosure-about-climate-risk-disclosure/>)
16. “More Disclosure About ‘Climate Risk Disclosure.’” Government Accountability & Oversight. July 13, 2023. Available at: <https://govoversight.org/more-disclosure-about-climate-risk-disclosure/> (<https://govoversight.org/more-disclosure-about-climate-risk-disclosure/>)
17. Memorandum to Comment File – Climate Change Disclosures From Mika Morse. Re: Meeting with Representatives of Persefoni. Securities and Exchange Commission. November 30, 2021. Available at: <https://www.sec.gov/comments/s7-10-22/s71022-persefoni.pdf> (<https://www.sec.gov/comments/s7-10-22/s71022-persefoni.pdf>)
18. Kentaro Kawamori. “Open Letter: How Business Leaders Should Prepare on Heels of the SEC Climate Proposal.” PR Newswire. March 22, 2022. Available at: <https://www.prnewswire.com/news-releases/open-letter-how-business-leaders-should-prepare-on-heels-of-the-sec-climate-proposal-301508027.html> (<https://www.prnewswire.com/news-releases/open-letter-how-business-leaders-should-prepare-on-heels-of-the-sec-climate-proposal-301508027.html>)

19. Kentaro Kawamori. "Open Letter to Business Leaders on the Cost of Carbon Disclosure." Persefoni. April 21, 2022. Available at: <https://web.archive.org/web/20230203111747/https://persefoni.com/newsroom/open-letter-to-business-leaders-on-the-cost-of-carbon-disclosure> (<https://web.archive.org/web/20230203111747/https://persefoni.com/newsroom/open-letter-to-business-leaders-on-the-cost-of-carbon-disclosure>)
20. Public Comment on Proposed Rule: Enhancement and Standardization of Climate-Related Disclosures for Investors. Persefoni. May 20, 2022. Available at: <https://www.sec.gov/comments/s7-10-22/s71022-20129131-295032.pdf> (<https://www.sec.gov/comments/s7-10-22/s71022-20129131-295032.pdf>)
21. "Cost of Climate Disclosure Survey Fact Sheet." ERM. Accessed August 31, 2023. Available at: [https://www.sustainability.com/globalassets/sustainability.com/thinking/pdfs/2022/climate-disclosure-survey\\_fact-sheet-12-may-2022.pdf](https://www.sustainability.com/globalassets/sustainability.com/thinking/pdfs/2022/climate-disclosure-survey_fact-sheet-12-may-2022.pdf) ([https://www.sustainability.com/globalassets/sustainability.com/thinking/pdfs/2022/climate-disclosure-survey\\_fact-sheet-12-may-2022.pdf](https://www.sustainability.com/globalassets/sustainability.com/thinking/pdfs/2022/climate-disclosure-survey_fact-sheet-12-may-2022.pdf))
22. Memorandum to File No. S7-10-22 from Jill S. Henderson re: Meeting with Ceres, Persefoni and ERM. June 7, 2022. Available at: <https://www.sec.gov/comments/s7-10-22/s71022-20130558-299433.pdf> (<https://www.sec.gov/comments/s7-10-22/s71022-20130558-299433.pdf>)
23. Public Comment on Proposed Rule: The Enhancement and Standardization of Climate-Related Disclosures for Investors. Steven M. Rothstein, Managing Director, Ceres and Mike Wallace, Chief Decarbonization Officer, Persefoni. April 6, 2023. Available at: <https://www.sec.gov/comments/s7-10-22/s71022-20163766-333922.pdf> (<https://www.sec.gov/comments/s7-10-22/s71022-20163766-333922.pdf>)
24. Comments of the American Petroleum Institute on the Proposed Rule "The Enhancement and Standardization of Climate-Related Disclosures for Investors." American Petroleum Institute. June 17, 2022. Available at: <https://www.sec.gov/comments/s7-10-22/s71022-20131811-302248.pdf> (<https://www.sec.gov/comments/s7-10-22/s71022-20131811-302248.pdf>)
25. Public Comment on Proposed Rule: The Enhancement and Standardization of Climate-Related Disclosures for Investors. Business Roundtable. June 17, 2022. Available at: <https://www.sec.gov/comments/s7-10-22/s71022-20132191-302705.pdf> (<https://www.sec.gov/comments/s7-10-22/s71022-20132191-302705.pdf>)
26. Public Comment on Proposed Rule: The Enhancement and Standardization of Climate-Related Disclosures for Investors. U.S. Chamber of Commerce. June 16, 2022. Available at: <https://www.sec.gov/comments/s7-10-22/s71022-20131892-302347.pdf> (<https://www.sec.gov/comments/s7-10-22/s71022-20131892-302347.pdf>)
27. "The Ceres Report." Consumers' Research. July 2023. Pages 19-20. Available at: <https://consumersresearch.org/wp-content/uploads/2023/07/CR-Ceres-Report.pdf> (<https://consumersresearch.org/wp-content/uploads/2023/07/CR-Ceres-Report.pdf>)
28. Matthew Winden. "Are Climate Disclosures Worth the Cost?" The Hill. June 21, 2023. Available at: <https://thehill.com/opinion/finance/4059135-are-climate-disclosures-worth-the-cost/> (<https://thehill.com/opinion/finance/4059135-are-climate-disclosures-worth-the-cost/>)
29. Dan Eberhart. "Report Reveals ESG Supports' Campaign to Influence Regulators." Forbes. August 25, 2023. Available at: <https://www.forbes.com/sites/daneberhart/2023/08/25/report-reveals-esg-supports-campaign-to-influence-regulators/?sh=596e917458c6> (<https://www.forbes.com/sites/daneberhart/2023/08/25/report-reveals-esg-supports-campaign-to-influence-regulators/?sh=596e917458c6>)
30. "Persefoni Appoints Kristina Wyatt as Chief Sustainability Officer." Persefoni. April 27, 2023. Available at: <https://www.persefoni.com/insight/persefoni-appoints-kristina-wyatt-chief-sustainability-officer>

(<https://www.persefoni.com/insight/persefoni-appoints-kristina-wyatt-chief-sustainability-officer>)

31. Allison Herren Lee. "Public Input Welcomed on Climate Change Disclosures." U.S. Securities and Exchange Commission. March 15, 2021. Available at: <https://www.sec.gov/news/public-statement/lee-climate-change-disclosures> (<https://www.sec.gov/news/public-statement/lee-climate-change-disclosures>)
32. "Kristina Wyatt Joins Persefoni as Deputy General Counsel and SVP Global Regulatory Climate Disclosure." PR Newswire. March 7, 2022. Available at: <https://www.prnewswire.com/news-releases/kristina-wyatt-joins-persefoni-as-deputy-general-counsel-and-svp-global-regulatory-climate-disclosure-301496249.html> (<https://www.prnewswire.com/news-releases/kristina-wyatt-joins-persefoni-as-deputy-general-counsel-and-svp-global-regulatory-climate-disclosure-301496249.html>)
33. "Persefoni Appoints Kristina Wyatt as Chief Sustainability Officer." Persefoni. February 28, 2023. Available at: <https://www.persefoni.com/insight/persefoni-appoints-kristina-wyatt-chief-sustainability-officer> (<https://www.persefoni.com/insight/persefoni-appoints-kristina-wyatt-chief-sustainability-officer>)
34. "Emily Pierce Named Chief Global Policy Officer at Persefoni." Persefoni. June 7, 2023. Available at: <https://www.persefoni.com/insight/emily-pierce-named-chief-global-policy-officer-at-persefoni> (<https://www.persefoni.com/insight/emily-pierce-named-chief-global-policy-officer-at-persefoni>)
35. "Former Acting Chair of SEC, Allison Herren Lee, Joins Persefoni Sustainability Advisory Board." Persefoni. May 10, 2023. Available at: <https://www.persefoni.com/insight/allison-herren-lee-joins-persefoni-sustainability-advisory-board> (<https://www.persefoni.com/insight/allison-herren-lee-joins-persefoni-sustainability-advisory-board>)
36. <sup>[1]</sup> "Allison Herren Lee." Persefoni. Accessed August 30, 2023. Available at: <https://www.persefoni.com/people/allison-herren-lee> (<https://www.persefoni.com/people/allison-herren-lee>)
37. "Kentaro Kawamori." Persefoni. Accessed August 14, 2023. Available at: <https://www.persefoni.com/people/kentaro-kawamori> (<https://www.persefoni.com/people/kentaro-kawamori>)
38. "Kentaro Kawamori." Rice Investment Group. Accessed September 6, 2023. Available at: <https://riceinvestmentgroup.com/team/kentaro-kawamori/> (<https://riceinvestmentgroup.com/team/kentaro-kawamori/>)
39. "Kentaro Kawamori." Forbes. Accessed September 6, 2023. Available at: <https://www.forbes.com/profile/kentaro-kawamori/?sh=6af677556097> (<https://www.forbes.com/profile/kentaro-kawamori/?sh=6af677556097>)
40. "Jason Offerman." Persefoni. Accessed September 6, 2023. Available at: <https://www.persefoni.com/people/jason-offerman> (<https://www.persefoni.com/people/jason-offerman>)
41. "Kim Stroh." Persefoni. Accessed August 28, 2023. Available at: <https://www.persefoni.com/people/kim-stroh> (<https://www.persefoni.com/people/kim-stroh>)
42. "Kristina Wyatt." Persefoni. Accessed August 14, 2023. Available at: <https://www.persefoni.com/people/kristina-wyatt> (<https://www.persefoni.com/people/kristina-wyatt>)
43. "The Persefoni Sustainability Advisory Board." Persefoni. Accessed August 29, 2023. Available at: <https://www.persefoni.com/company/sustainability-advisory-board> (<https://www.persefoni.com/company/sustainability-advisory-board>)
44. <sup>[1]</sup> "Emily Pierce." Persefoni. Accessed August 14, 2023. Available at: <https://www.persefoni.com/people/emily-pierce> (<https://www.persefoni.com/people/emily-pierce>)
45. "Allison Herren Lee." Persefoni. Accessed August 30, 2023. Available at: <https://www.persefoni.com/people/allison-herren-lee> (<https://www.persefoni.com/people/allison-herren-lee>)



46. "Robert Eccles." Persefoni. Accessed August 29, 2023. Available at: <https://www.persefoni.com/people/robert-eccles>  
(<https://www.persefoni.com/people/robert-eccles>)
47. "About." Robert G. Eccles. Accessed August 29, 2023. Available at: <https://roberteccles.com/about/>  
(<https://roberteccles.com/about/>)
48. Persefoni. "ClimateTech Startup Persefoni Raises \$9.7M in Series A Funding Round." PR Newswire. April 15, 2021. Available at: <https://www.prnewswire.com/news-releases/climatetech-startup-persefoni-raises-9-7m-in-series-a-funding-round-301269315.html> (<https://www.prnewswire.com/news-releases/climatetech-startup-persefoni-raises-9-7m-in-series-a-funding-round-301269315.html>)
49. Persefoni. "Climate Tech SaaS Startup Persefoni Announced \$101M in Series B and Launch of Free Carbon Accounting Product." PR Newswire. October 28, 2021. Available at: <https://www.prnewswire.com/news-releases/climate-tech-saas-startup-persefoni-announced-101m-in-series-b-and-launch-of-free-carbon-accounting-product-301410581.html>  
(<https://www.prnewswire.com/news-releases/climate-tech-saas-startup-persefoni-announced-101m-in-series-b-and-launch-of-free-carbon-accounting-product-301410581.html>)
50. Persefoni. "Leading Climate Tech Company, Persefoni, Announces \$50 Million Series C1 and Next AI Advancement." PR Newswire. August 11, 2023. Available at: <https://www.prnewswire.com/news-releases/leading-climate-tech-company-persefoni-announces-50-million-series-c1-and-next-ai-advancement-301898495.html> (<https://www.prnewswire.com/news-releases/leading-climate-tech-company-persefoni-announces-50-million-series-c1-and-next-ai-advancement-301898495.html>)

❗ See an error? Let us know! (</contribute-to-influencewatch/#report-error>)