

PJM Comments Regarding Security & Exchange Commission's Climate-Related Disclosure Proposal

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- Require climate-related disclosure in statements and annual reports
 - Risks that are reasonably likely to have a material impact
 - Greenhouse gas emissions
 - Climate-related financial metrics



Comment Focus

- Greenhouse gas emissions
 - Scope 2 emissions
 - Emissions from Purchased Electricity
 - Methodology leans on GHG protocol average annual emissions
- Comments seek to allow use of PJM's marginal emissions rate data



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PJM Comments on Proposed SEC Rule Changes



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