3050 K St. N.W. Suite 302 Washington, D.C. 20007 | (540) 202-5161 | info@theiarisk.com

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VIA ELECTRONIC SUBMISSION

Vanessa Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549-0609

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

To Whom It May Concern:

Thank you for the opportunity to comment on SEC Release Nos. 33-11042; 34-94478; File No. S7-10-22 RIN 3235-AM87. Theia Analytics Group, Inc. (TAG™) is a quantitative applied analytics company building a suite of products to create the world's first governance-focused intelligence engine. TAG specializes in identifying regulatory and policy risks to help meet Environmental, Social, and Governance (ESG) goals. We believe incorporating appropriate disclosure materiality will aid the Securities and Exchange Commission's (Commission) efforts to promote efficiency, competition, and capital formation.

We must note that the G of ESG is the strongest indicator of how well a company is adhering to climate rule disclosures, as it is directly correlated to the outcomes of transition activity. Below, we provide comments on the Enhancement and Standardization of Climate-Related Disclosures as it pertains to the "governance" aspect of ESG because, without good governance, it will be difficult, if not impossible, for global entities to meet sustainability and environmental goals.

TAG Recommendations:

1. To achieve "consistent, comparable, reliable, and decision-useful" climate disclosures, registrants must apply a quantitative approach that informs their governance strategy. Unfortunately, the qualitative nature of annual, quarterly, and ad hoc disclosure preparation lacks the technical infrastructure to form governance metrics that achieve the measurement goals of the proposed rule. Therefore, the climate disclosure requirements should be quantitative machine-readable standards for measuring, documenting, and disclosing ESG-related risks.

2. The transition risks of climate-related disclosures are opaque and need standardized measurements that allow apples-to-apples comparisons. If a registrant has adopted a transition plan, the registrant must describe the plan, including the relevant metrics and targets used to identify and manage physical and transition risks. Additionally, these disclosures must include reporting methodologies, data sources, assumptions, and other key parameters to assess climate risk.

3. Before finalizing climate disclosure rules, the Commission needs to thoroughly consider, discuss, and align with key stakeholders about the potential optimizing, redefining, or disrupting value of any data analytics initiative. Additionally, the Commission should hone in on the appropriate data and formatting standards that promote efficiency, competition, and capital formation. Finally, the Commission needs to build a supported hypothesis on what will be achieved by the final rule and how disclosure requirements will improve insights for various stakeholders.

4. A clear need exists to involve business and technical skills to confront the multi-faceted challenges linked to big data analytics for climate disclosures. Further, the Commission can complement its capabilities with the strengths of partners and suppliers to obtain quantifiable analytic tools that will inform the Commission in ways previously unavailable.

5. To address the needs of multidisciplinary stakeholders in a varied landscape of technical solutions, the Commission's regulatory imperative should be to design standards that present blended, scalable, and flexible data architectures. In addition, the Commission needs to prepare for change as technology is continuously evolving at an exponential pace.

Concerning these recommendations, the Commission should consider itself part of a broader ecosystem of insight-driven organizations. In doing so, the Commission ought to:

1. Understand that information management and quantitative meta-data are essential for more than just internal challenges. Data exchange with other agencies, internal and external to the Commission, can lead to multiple new domains where data brings value to regulators and registrants alike. The semantic interoperability challenges inherent to meta-data will only grow as the pace of big data source creation accelerates. In the meantime, during this period of technological acceleration, we can rely on the promise of meta-data to bring transparency and accountability to the Commission and registrants. Because the opportunity for enhanced transparency and accountability exists, it presents an exceptional regulatory opportunity for the Commission to deal with secure technological ecosystems on the one hand and regulatory governance frameworks on the other; except now, the Commission may do them simultaneously. Prescient opportunities of this kind do not often come around. The fortuitous timing of the proposed climate disclosure regulations and the vast technological capabilities of quantitative meta-data establishes a unique position for the Commission, namely that it will be able to serve all three of its core goals simultaneously. Specifically, "1) focus on the long-term interests of our Main Street investors, 2) recognize significant developments and trends in our evolving capital markets and adjust our efforts to ensure we are effectively allocating our resources, and 3) elevate the SEC's performance by enhancing our analytical capabilities and human capital development", each of which are well-served by what we suggest.

2. Consider big data analytics a relevant domain where government agencies have increasingly higher stakes and benefits with public and private partners. Collaboration in this area can be achieved in multiple ways. For example, it can be provided in the form of providing insights on the benefits of big data analytics (insight services), guidance and concrete advice on the use of big data analytics (advisory services), essential tools, data, and resources (e.g., technology, funding, people, and skills) for big data analytics (enabling services), and/or providing readymade solutions or conducting data analytics for others (production services).

Thank you for the opportunity to comment.

Should you have any questions or concerns, please contact Erica Tergeson at [redacted].