

June 16, 2022

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

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

Dear Ms. Countryman:

Trane Technologies plc (“Trane Technologies”) appreciates the opportunity to provide comments to the U.S. Securities and Exchange Commission (the “Commission”) on File No. S7-10-22, the Commission’s proposed rules regarding the enhancement and standardization of climate-related disclosures for investors. We commend the Commission’s efforts to require consistent, comparable and reliable climate-related disclosures. As a supporter of the Task Force on Climate-related Financial Disclosures (“TCFD”) and its recommendations, we applaud the Commission for modeling the proposed rules in part on the TCFD disclosure framework. Trane Technologies supports the Commission’s effort to shape the compliance regime for climate-related disclosures, and we also encourage strong alignment with existing frameworks, including the GHG Protocol and the Science Based Targets initiative (“SBTi”).

Every day at Trane Technologies, we strive to challenge what is possible for a sustainable world. Climate change, urbanization, indoor environmental quality and other megatrends are increasingly drawing global attention, and customer demand for sustainable solutions continues to grow. Sustainability has long been at the core of our business strategy. We have made bold commitments relating to the environmental and social impact of our operations, products, services and people. We began reporting on our sustainability initiatives in 2011 and annually produce a standalone Environmental, Social and Governance (“ESG”) report, which discloses our progress towards our sustainability commitments.

Our annual ESG report is informed by leading ESG and sustainability reporting frameworks including: Global Reporting Initiative (“GRI”), Sustainability Accountability Standards Board (“SASB”), TCFD, World Economic Forum (“WEF”) Stakeholder Capitalism Metrics and CDP (formerly known as the Climate Disclosure Project), among others. Our sustainability approach also takes into account numerous charters that we believe support and advance our sustainability goals including: Alliance of CEO Climate Leaders, Business Ambition for 1.5°C, CEO Action for Diversity & Inclusion, Clean Energy Ministerial (“CEM”) Advanced Cooling (“AC”) Challenge, Climate and Clean Air Coalition HFC Initiative, Disability:IN’s CEO Letter, Digital Climate Alliance, EP 100 as well as EP100’s Cooling Challenge, First Movers Coalition, OneTen Coalition,

Paradigm for Parity, Race to Zero, RE100, Sustainable Energy for All, The Cool Coalition, The Three Percent Club, U.S. Department of Energy Better Plants Challenge, WEConnect International, We Are Still In, We Mean Business: Commitment to Reduce Short-Lived Pollutant Emissions and We Mean Business: Adopt a Science-Based Emissions Reduction Target.

We are a proud member of these voluntary climate networks, standard setters and organizations, but the number and variety of these organizations underscore the fragmented and inconsistent nature of current voluntary climate-related disclosure regimes and the need for more consistent regulatory requirements that create both an equal playing field and a consistent use of sustainability taxonomy and standards for public companies. We believe that the proposed rules, if adopted, will be instrumental in creating reliable and comparable climate-related disclosures across peer groups that facilitate investor research and informed investment choices, as well as reduce the need for disparate voluntary frameworks.

We support the Commission's proposal for registrants to disclose their use of carbon offsets or renewable energy credits or certificates ("RECs") in meeting their net emissions reduction strategy. We have our net-zero carbon emissions targets approved by SBTi, a coalition of the Carbon Disclosure Project, the United Nations Global Compact, World Resources Institute and the World Wildlife Fund (WWF). As a company adhering to SBTi standards, we believe that information on a registrant's use of carbon offsets or RECs is necessary for investors to fully understand the nature of the registrant's progress towards meeting its sustainability goals and climate-related business strategy. Transparent disclosure of the use of offsets and RECs would also facilitate comparisons across companies by investors.

The Commission has asked for feedback on whether climate-related disclosures should be required in Securities Act or Exchange Act registration statements and Exchange Act annual reports, as proposed, or in a new regulation or report. We respectfully request that the Commission consider requiring climate-related disclosures in a standalone report with a staggered due date from the Form 10-K or in a quarterly report due later during the fiscal year to lessen the burden of preparing climate-related disclosures concurrently with finalizing the Annual Report on Form 10-K. In light of the significant timing challenges and additional processes, including coordination with third-party providers, that are expected in order for companies to provide the proposed climate-related disclosures in the Form 10-K, we believe requiring such disclosures at a sufficient time after the Form 10-K due date would better serve the Commission's goal of providing accurate and complete climate-related disclosures. Under the Commission's proposal, Trane Technologies, as a large accelerated filer, would be required to provide climate-related disclosures including Scope 1, Scope 2 and Scope 3 greenhouse gas emissions within 60 days after the end of the previous fiscal year. While we have worked diligently to accelerate our annual ESG report to an April timeline for publication, further accelerating the finalization of climate-related disclosures into January or February would be challenging for us even though, as described below, we believe that our company has already taken numerous steps to implement processes to gather information for certain of these proposed disclosures.

For example, Trane Technologies has modified its data systems such that we can collect the downstream data related to Scope 3 product emissions footprints when our product is installed at a customer location. We understand that other companies have not adjusted their systems to collect

similar data but, without this level of insight, we believe a proper accounting and assessment of emissions cannot adequately be performed. It takes a considerable effort to collect, validate and assure greenhouse gas emissions and climate-related financial data, among others, and the requisite work often involves many multi-functional teams within the organization, some of whom already have responsibilities related to preparation of the consolidated financial statements and other disclosures for the Form 10-K. For similar reasons, with respect to the proposed third-party attestation requirement over Scope 1 and Scope 2 greenhouse gas emissions, it would not be practicable for large accelerated filers and accelerated filers with a December 31 fiscal year end to not only track, collect and internally validate greenhouse gas emissions data but also obtain external assurance in time for the filing of the Form 10-K.

The Commission has also asked for feedback on its proposal to require disclosure of climate-related financial impact metrics if the absolute value of the total impact is equal to or greater than 1% of the total line item for the relevant fiscal year – a 1% prescribed disclosure threshold regardless of materiality. We respectfully request that the Commission employ existing materiality standards for determining when climate-related financial statement disclosure is required, consistent with its longstanding practice, rather than an arbitrary 1% threshold. Under the proposed rules, registrants would have to collect, analyze, report and track data concerning climate-related financial impacts at levels that are not currently required under U.S. Generally Accepted Accounting Principles. We believe a principles-based materiality requirement for disclosure in the categories outlined by the Commission, together with the proposed requirement to provide enhanced climate-related risk disclosure, should be sufficient to provide investor transparency into these financial metrics.

In summary, Trane Technologies:

- supports the Commission’s efforts to create consistent, comparable and reliable climate-related disclosures;
- supports proposed rules that are based on the TCFD disclosure framework;
- encourages strong alignment with existing frameworks, including the GHG Protocol and the SBTi;
- supports the proposal for registrants to disclose their use of carbon offsets or RECs in meeting their net emissions reduction strategy;
- requests that the Commission require climate-related disclosures in a standalone report with a staggered due date from the Form 10-K or in a quarterly report due later during the fiscal year to lessen the burden of preparing climate-related disclosures concurrently with finalizing an annual report; and
- requests that the Commission employ existing materiality standards for determining when climate-related financial statement disclosure is required, consistent with its longstanding practice, rather than the proposed 1% threshold.

Trane Technologies appreciates the Commission’s leadership in proposing these rules and supports the Commission’s efforts to bring reliability and comparability to climate-related disclosures. We thank you for the opportunity to provide our comments and welcome any opportunity to further discuss these matters with the Commission or its Staff as appropriate.

Respectfully,

A handwritten signature in blue ink, appearing to read "Christopher J. Kuehn". The signature is fluid and cursive, with a large loop at the end.

Christopher J. Kuehn
Executive Vice President and Chief Financial Officer