

June 8, 2022

Ms. Vanessa Countryman
Secretary
Securities and Exchange Commission
100 F Street N.E.
Washington, D.C. 20549-1090

RE: File Number S7-10-22: The Enhancement and Standardization of Climate-Related Disclosures for Investors

Dear Ms. Countryman,

The McKnight Foundation writes in enthusiastic support for the proposed regulatory enhancements on climate-related disclosure. This is an important step in ensuring capital markets are fair, and sufficiently transparent, so investors may respond effectively to the risk of climate change across companies and in financial markets.

The McKnight Foundation is a private family foundation founded in 1953. With \$3 billion in assets under management, we are truly long-term investors. Our endowment provides more than \$120 million in private philanthropic support annually. Last year, McKnight became the largest US foundation to commit to Net Zero; setting a target to decarbonize our endowment by 2050 at the latest.

In the future, all of McKnight's public and private fund managers will be required to understand and analyze the emissions of their portfolio companies. In the public markets, investors rely on and expect consistent, accurate and available data to invest. Like financial accounting, reliable climate-related disclosure should not only be limited to public markets but to private markets as well. Apart from being an environmental imperative, such disclosure provides our investment managers with the most up-to-date information to make informed investment decisions for the long-term.

The proposal is well aligned with the SEC's mandate of maintaining fair markets and ensuring market actors have accurate information for investing. While the proposal addresses Scope 1, 2, and 3 emissions, we believe there is room for even stronger disclosure requirements for companies. This should include, but not be limited to, improving transparency on climate-related risks in private markets, by mandating disclosure, and in-depth scenario analysis on company performance in different environmental situations.

For the past 20 years, through the work of essential organizations like CDP, thousands of companies have proven that disclosure is not only possible but necessary. We have been encouraged by evolving sophistication in the field, like the Task Force on Climate-Related Financial Disclosures, that guides companies in disclosing material risks and opportunities. The current SEC proposal will help ensure the verifiability of data that many companies already disclose voluntarily. Finally, this regulatory enhancement will create a more level playing field across sectors by requiring all companies to assume realistic practices, that are currently an added cost to responsible companies.

Based on several generations of scientific evidence and consensus, we must rapidly decarbonize our country and economy by 2050 in order to avoid the most catastrophic impacts of climate change. For this reason, ***the McKnight Foundation writes in strong support of implementing this rule to mandate climate-related financial disclosures.***

Thank you very much for your consideration of our view on this essential economic matter. If you have

any questions, I hope you will contact me directly at [REDACTED] or via email at [REDACTED].

Sincerely,



Elizabeth McGeeveran
Director of Investments
McKnight Foundation

Cc: The Honorable Gary Gensler, Chair
The Honorable Caroline A. Crenshaw, Commissioner
The Honorable Allison Herren lee, Commissioner
The Honorable Hester M. Peirce, Commissioner
Securities and Exchange Commission