

## **MEMORANDUM**

**To:** Comment File - Climate Change Disclosures

**From:** Mika Morse, Policy Counsel to Chair Gary Gensler, U.S. Securities and Exchange Commission

**Date:** January 21, 2022

**Re:** Meeting with Representatives of Ledger8760

On January 18, 2022, staff from the Chair's Office and the Division of Economic and Risk Analysis met telephonically with representatives of Ledger8760, including the chief executive officer and the chief development officer, and a representative from Cassidy & Associated.

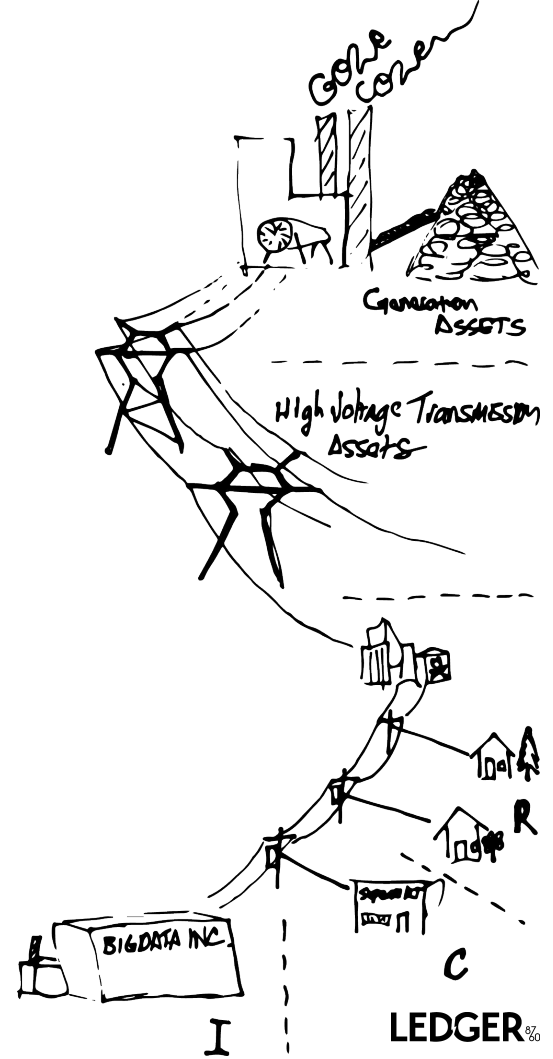
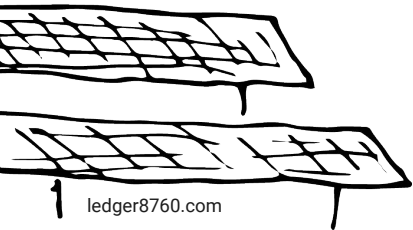
During the call, the representatives from Ledger8760 provided information about their greenhouse gas (GHG) emissions tracking platform. The representatives from Ledger8760 discussed the cost and internal resources required from companies to engage with their platform, and the variables that may impact the cost of GHG emissions accounting and disclosure.

During the meeting, the representatives from Ledger8760 estimated ranges of costs based on their experience working with corporations that voluntarily initiate a GHG emissions disclosure program. They followed up the meeting by sending the following attachments: "Ledger8760," "Generic Pricing," and "Ledger8760 Policy One Pager," on January 21, 2022. (Attachments enclosed)

There is average data  
& there is Ledger data

January 19, 2022

Founded by an *energy lobbyist*  
& a *regulatory attorney* who shaped  
state & western regional policy



# Greenhouse gas reporting has become critical

➔ 60%  
of Fortune 500 companies  
have set climate goals



“The price of carbon...**could likely be between \$50 & \$100 per ton of CO2**...and rise from there.”



“**80% of the world is not on track to hit their Paris Climate Accord targets**”



“sustainability...our new standard for investing...”



“**57% of consumers are willing to change their purchasing habits** to help reduce negative environmental impact.”



# But data is hard to collect, manage, & share with stakeholders



Area code	Area name	2012/1 to 2012/2			2012/3 to 2012/4			2012/5 to 2012/6			2013/1 to 2013/2										
		Revenue	Expenditure	Net	Revenue	Expenditure	Net	Revenue	Expenditure	Net	Revenue	Expenditure	Net								
01	01000000 England	80076	166555	23.2	22.4	25.5	88939	179204	22.4	22.4	22.5	89254	179722	22.2	22.2	22.1	40443	162796	22.2	22.1	22.1
02	02000000 Buckinghamshire CC	1386	8952	28.8	28.0	28.8	1427	8927	28.2	28.2	28.8	2121	8862	28.1	27.9	28.1	2225	8764	28.2	27.9	27.9
03	03000000 Cambridgeshire CC	3901	8898	21.4	20.8	20.0	4029	1860	20.0	20.0	20.8	4038	1872	20.2	20.2	20.8	4038	1872	20.2	20.2	20.2
04	04000000 Cornwall CC	3066	10621	23.9	23.2	24.1	3147	2611	23.8	24.8	24.9	3478	4566	24.8	24.1	25.2	3742	14427	25.8	25.2	26.1
05	05000000 Derbyshire CC	5975	2290	21.8	21.3	20.6	2948	2186	21.0	21.1	21.2	3332	2008	21.5	21.0	22.0	5275	2392	21.8	21.8	22.2
06	06000000 Devon CC	2745	10771	23.9	23.1	22.7	2140	2000	23.6	23.7	23.7	2461	1287	23.9	23.2	23.2	2980	1198	23.9	23.2	23.2
07	07000000 Dorset CC	4294	1296	22.0	22.1	22.1	1447	1442	21.4	22.1	22.1	4262	1641	22.1	22.1	22.1	4443	1025	22.1	22.1	22.1
08	08000000 East Sussex CC	1940	4420	20.7	20.1	20.1	4431	4034	20.6	20.4	21.1	5651	4629	20.7	20.3	21.1	897	4055	20.9	20.5	20.5
09	09000000 Gloucestershire CC	2552	1287	22.4	22.2	22.5	1441	1441	22.4	22.7	22.4	4262	1641	22.4	22.4	22.4	4443	1025	22.4	22.4	22.4
10	10000000 Hampshire CC	7086	3811	20.2	19.8	20.0	822	4034	20.6	20.9	21.0	8659	4129	20.6	20.2	21.1	997	4055	21.1	21.1	21.1
11	11000000 Herefordshire CC	8028	1979	21.2	21.2	21.7	4020	1890	21.6	22.2	21.9	4923	339	21.9	21.9	21.9	4257	1047	21.9	21.9	21.9
12	12000000 Hertfordshire CC	1024	1743	21.4	21.0	21.6	1817	1914	21.4	21.9	21.9	2131	2141	21.9	21.9	21.9	2141	2141	21.9	21.9	21.9
13	13000000 Kent CC	1541	4707	22.2	21.8	21.6	1006	4756	21.4	21.1	21.8	1054	4615	21.7	21.1	21.1	1195	5012	21.7	21.7	21.7
14	14000000 Lancashire CC	8761	1743	21.4	21.0	21.6	1817	1914	21.4	21.9	21.9	2131	2141	21.9	21.9	21.9	2141	2141	21.9	21.9	21.9
15	15000000 Leicestershire CC	3981	1998	20.7	20.7	20.8	437	1998	20.9	21.4	21.4	437	1998	20.7	20.7	21.1	437	2093	20.8	20.8	20.8
16	16000000 Lincolnshire CC	548	2173	21.4	21.4	21.4	2174	2174	21.7	21.7	21.7	2174	2174	21.7	21.7	21.7	2174	2174	21.7	21.7	21.7
17	17000000 Norfolk CC	554	2890	23.3	23.7	23.8	2819	2530	23.2	23.5	23.5	587	2082	23.6	23.1	23.1	397	2531	23.6	23.6	23.6
18	18000000 North Yorkshire CC	5291	2009	21.4	21.4	21.4	2009	2009	21.7	21.7	21.7	2009	2009	21.7	21.7	21.7	2009	2009	21.7	21.7	21.7
19	19000000 North Warwickshire CC	3382	2465	20.3	20.7	20.9	3192	1685	21.1	20.5	21.7	3641	1202	21.4	21.8	22.0	367	1738	21.4	21.4	21.4
20	20000000 North West Leicestershire CC	487	2320	21.0	20.5	20.8	2430	2120	21.0	20.5	21.3	378	2058	21.0	21.0	21.0	378	2058	21.0	21.0	21.0
21	21000000 Nottingham CC	3518	2006	21.1	21.6	21.7	2100	192	21.6	21.7	21.7	451	2143	21.6	21.6	21.6	451	2143	21.6	21.6	21.6
22	22000000 Nottinghamshire CC	3182	2465	20.3	20.7	20.9	3192	1685	21.1	20.5	21.7	3641	1202	21.4	21.8	22.0	367	1738	21.4	21.4	21.4
23	23000000 Northamptonshire CC	487	2320	21.0	20.5	20.8	2430	2120	21.0	20.5	21.3	378	2058	21.0	21.0	21.0	378	2058	21.0	21.0	21.0
24	24000000 North Devon CC	3518	2006	21.1	21.6	21.7	2100	192	21.6	21.7	21.7	451	2143	21.6	21.6	21.6	451	2143	21.6	21.6	21.6
25	25000000 North Dorset CC	3182	2465	20.3	20.7	20.9	3192	1685	21.1	20.5	21.7	3641	1202	21.4	21.8	22.0	367	1738	21.4	21.4	21.4
26	26000000 North East Lincolnshire CC	487	2320	21.0	20.5	20.8	2430	2120	21.0	20.5	21.3	378	2058	21.0	21.0	21.0	378	2058	21.0	21.0	21.0
27	27000000 North East Derbyshire CC	3518	2006	21.1	21.6	21.7	2100	192	21.6	21.7	21.7	451	2143	21.6	21.6	21.6	451	2143	21.6	21.6	21.6
28	28000000 North East Lincolnshire CC	3182	2465	20.3	20.7	20.9	3192	1685	21.1	20.5	21.7	3641	1202	21.4	21.8	22.0	367	1738	21.4	21.4	21.4
29	29000000 North East Lincolnshire CC	487	2320	21.0	20.5	20.8	2430	2120	21.0	20.5	21.3	378	2058	21.0	21.0	21.0	378	2058	21.0	21.0	21.0
30	30000000 North East Lincolnshire CC	3518	2006	21.1	21.6	21.7	2100	192	21.6	21.7	21.7	451	2143	21.6	21.6	21.6	451	2143	21.6	21.6	21.6
31	31000000 North East Lincolnshire CC	3182	2465	20.3	20.7	20.9	3192	1685	21.1	20.5	21.7	3641	1202	21.4	21.8	22.0	367	1738	21.4	21.4	21.4
32	32000000 North East Lincolnshire CC	487	2320	21.0	20.5	20.8	2430	2120	21.0	20.5	21.3	378	2058	21.0	21.0	21.0	378	2058	21.0	21.0	21.0
33	33000000 North East Lincolnshire CC	3518	2006	21.1	21.6	21.7	2100	192	21.6	21.7	21.7	451	2143	21.6	21.6	21.6	451	2143	21.6	21.6	21.6
34	34000000 North East Lincolnshire CC	3182	2465	20.3	20.7	20.9	3192	1685	21.1	20.5	21.7	3641	1202	21.4	21.8	22.0	367	1738	21.4	21.4	21.4
35	35000000 North East Lincolnshire CC	487	2320	21.0	20.5	20.8	2430	2120	21.0	20.5	21.3	378	2058	21.0	21.0	21.0	378	2058	21.0	21.0	21.0
36	36000000 North East Lincolnshire CC	3518	2006	21.1	21.6	21.7	2100	192	21.6	21.7	21.7	451	2143	21.6	21.6	21.6	451	2143	21.6	21.6	21.6
37	37000000 North East Lincolnshire CC	3182	2465	20.3	20.7	20.9	3192	1685	21.1	20.5	21.7	3641	1202	21.4	21.8	22.0	367	1738	21.4	21.4	21.4
38	38000000 North East Lincolnshire CC	487	2320	21.0	20.5	20.8	2430	2120	21.0	20.5	21.3	378	2058	21.0	21.0	21.0	378	2058	21.0	21.0	21.0
39	39000000 North East Lincolnshire CC	3518	2006	21.1	21.6	21.7	2100	192	21.6	21.7	21.7	451	2143	21.6	21.6	21.6	451	2143	21.6	21.6	21.6
40	40000000 North East Lincolnshire CC	3182	2465	20.3	20.7	20.9	3192	1685	21.1	20.5	21.7	3641	1202	21.4	21.8	22.0	367	1738	21.4	21.4	21.4
41	41000000 North East Lincolnshire CC	487	2320	21.0	20.5	20.8	2430	2120	21.0	20.5	21.3	378	2058	21.0	21.0	21.0	378	2058	21.0	21.0	21.0
42	42000000 North East Lincolnshire CC	3518	2006	21.1	21.6	21.7	2100	192	21.6	21.7	21.7	451	2143	21.6	21.6	21.6	451	2143	21.6	21.6	21.6
43	43000000 North East Lincolnshire CC	3182	2465	20.3	20.7	20.9	3192	1685	21.1	20.5	21.7	3641	1202	21.4	21.8	22.0	367	1738	21.4	21.4	21.4
44	44000000 North East Lincolnshire CC	487	2320	21.0	20.5	20.8	2430	2120	21.0	20.5	21.3	378	2058	21.0	21.0	21.0	378	2058	21.0	21.0	21.0
45	45000000 North East Lincolnshire CC	3518	2006	21.1	21.6	21.7	2100	192	21.6	21.7	21.7	451	2143	21.6	21.6	21.6	451	2143	21.6	21.6	21.6
46	46000000 North East Lincolnshire CC	3182	2465	20.3	20.7	20.9	3192	1685	21.1	20.5	21.7	3641	1202	21.4	21.8	22.0	367	1738	21.4	21.4	21.4
47	47000000 North East Lincolnshire CC	487	2320	21.0	20.5	20.8	2430	2120	21.0	20.5	21.3	378	2058	21.0	21.0	21.0	378	2058	21.0	21.0	21.0
48	48000000 North East Lincolnshire CC	3518	2006	21.1	21.6	21.7	2100	192	21.6	21.7	21.7	451	2143	21.6	21.6	21.6	451	2143	21.6	21.6	21.6
49	49000000 North East Lincolnshire CC	3182	2465	20.3	20.7	20.9	3192	1685	21.1	20.5	21.7	3641	1202	21.4	21.8	22.0	367	1738	21.4	21.4	21.4
50	50000000 North East Lincolnshire CC	487	2320	21.0	20.5	20.8	2430	2120	21.0	20.5	21.3	378	2058	21.0	21.0	21.0	378	2058	21.0	21.0	21.0
51	51000000 North East Lincolnshire CC	3518	2006	21.1	21.6	21.7	2100	192	21.6	21.7	21.7	451	2143	21.6	21.6	21.6	451	2143	21.6	21.6	21.6
52	52000000 North East Lincolnshire CC	3182	2465	20.3	20.7	20.9	3192	1685	21.1	20.5	21.7	3641	1								

The problem

90%

of firms aren't measuring  
emissions correctly (BCG)

**Bloomberg**

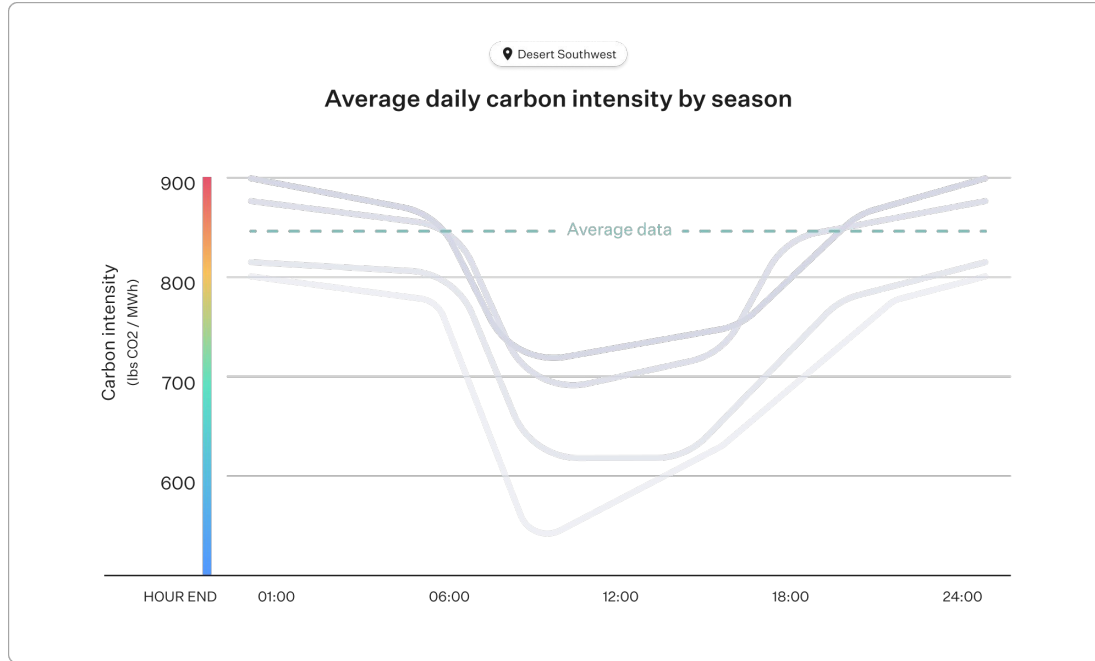


Countries' climate  
pledges built on flawed data,  
Post investigation finds

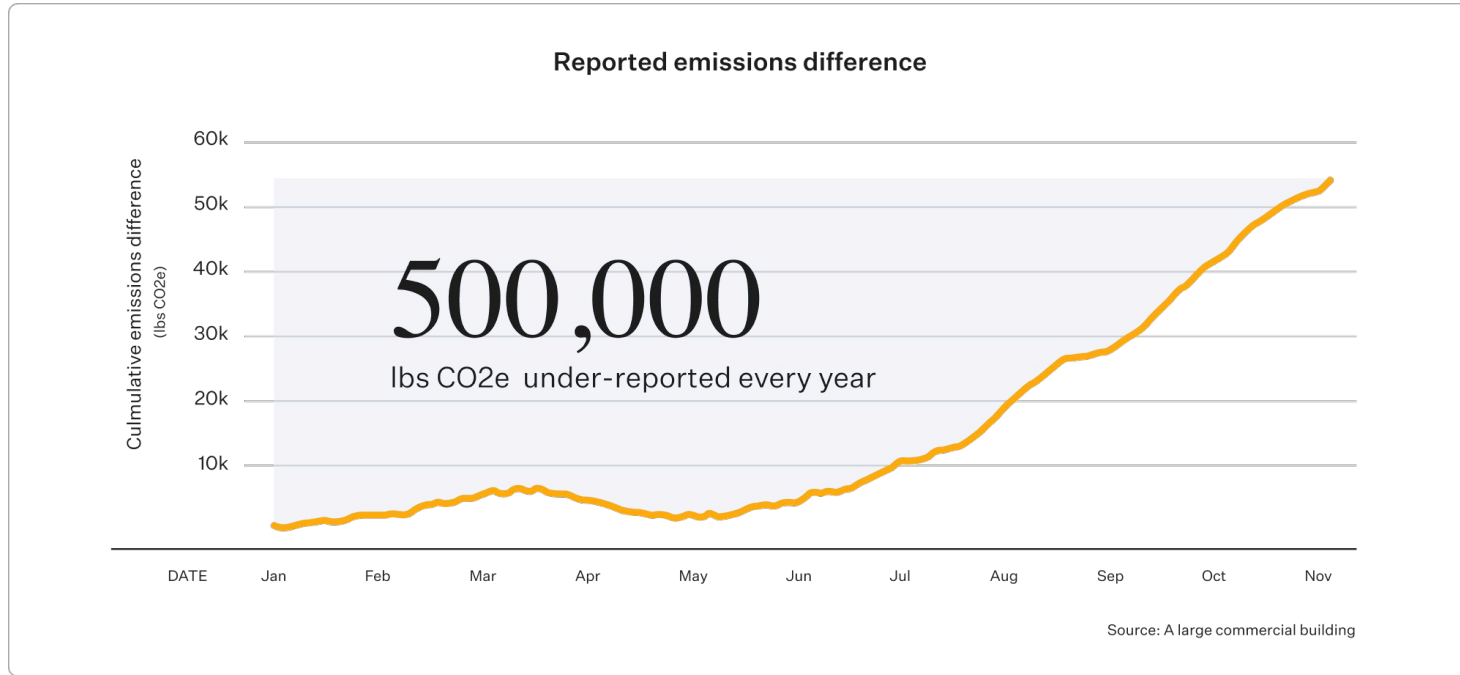
*The Washington Post*

Data accuracy  
is a *major* issue

# With emissions calculated off averages – & not actuals



# Resulting in massive miscalculations





Equivalent to GHG  
emissions from

**181**

Passenger vehicles driven for 1 year

**2,089,940**

Miles driven by an average passenger vehicle

*That's 83 trips around the world 🌐*

# Outdated averages are the industry standard



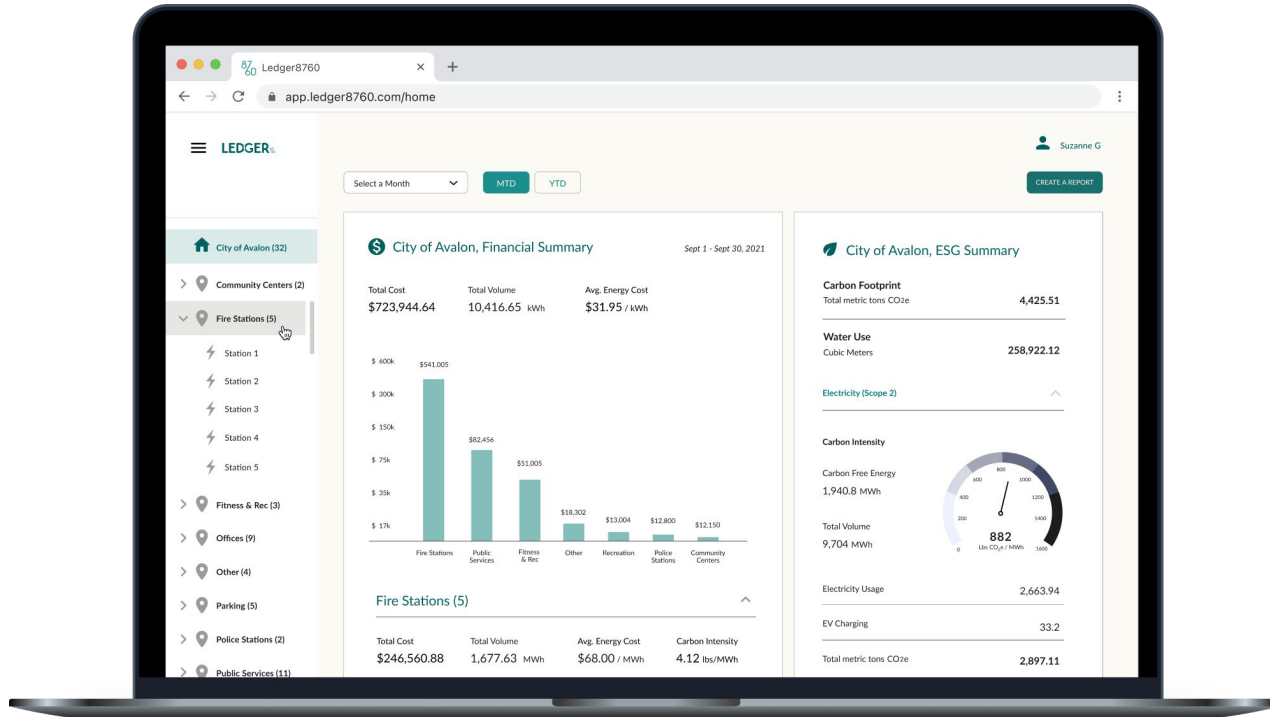
We estimate carbon emissions with European Environmental Agency (EEA) emission estimates *from 2019.*



We calculate emissions from electricity generation with the EPA's eGRID emission factors based on *2018 data*

The **best information**  
available to anyone,  
anywhere

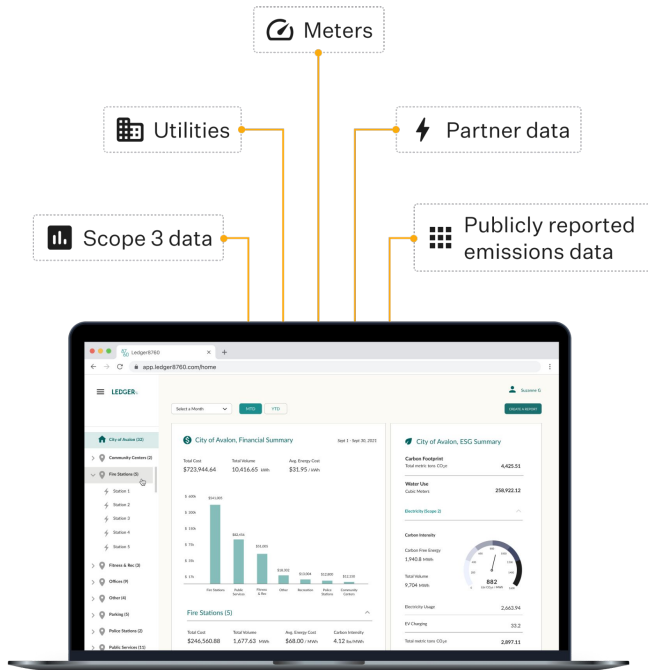
# Accurate. Actionable. 24/7.



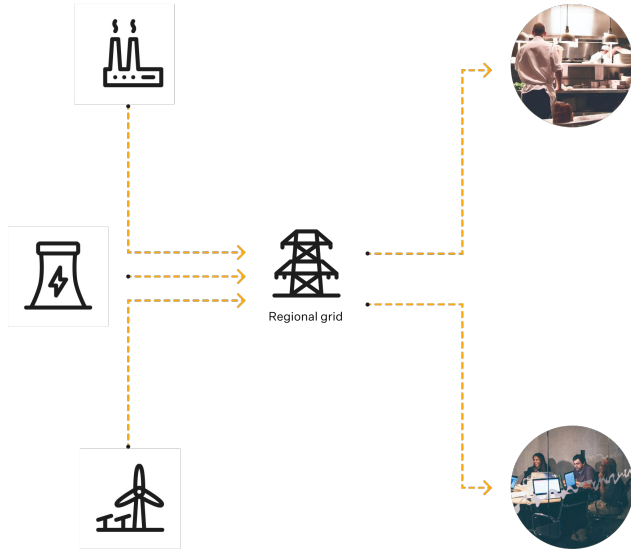




We use *your*  
data to understand  
*your* footprint

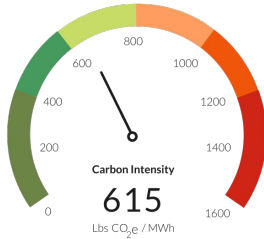


# Sync & automate all possible emissions points



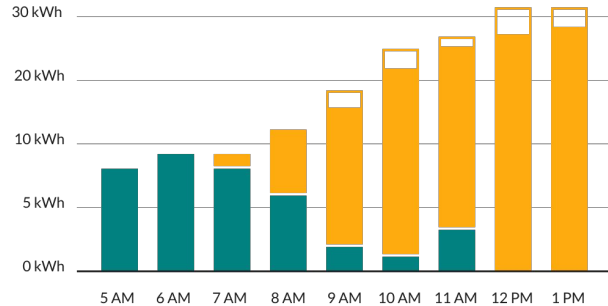
# Aggregate, normalize, & restructure data

*vs relying on published averages*



# Providing 24/7 emissions & financial insights

Utility Mix On-Site Solar Solar to Grid



So you can  
make smarter,  
more confident  
decisions

📍 Seattle

👍 Best time to charge  
All day

📍 Las Vegas

Intermediate time  
12 AM - 2 AM

👎 Worst time to charge  
2 AM - 6 AM

Intermediate time  
6 AM - 11 AM

👍 Best time to charge  
11 AM - 3 PM

Intermediate time  
3 PM - 12 AM

📍 London

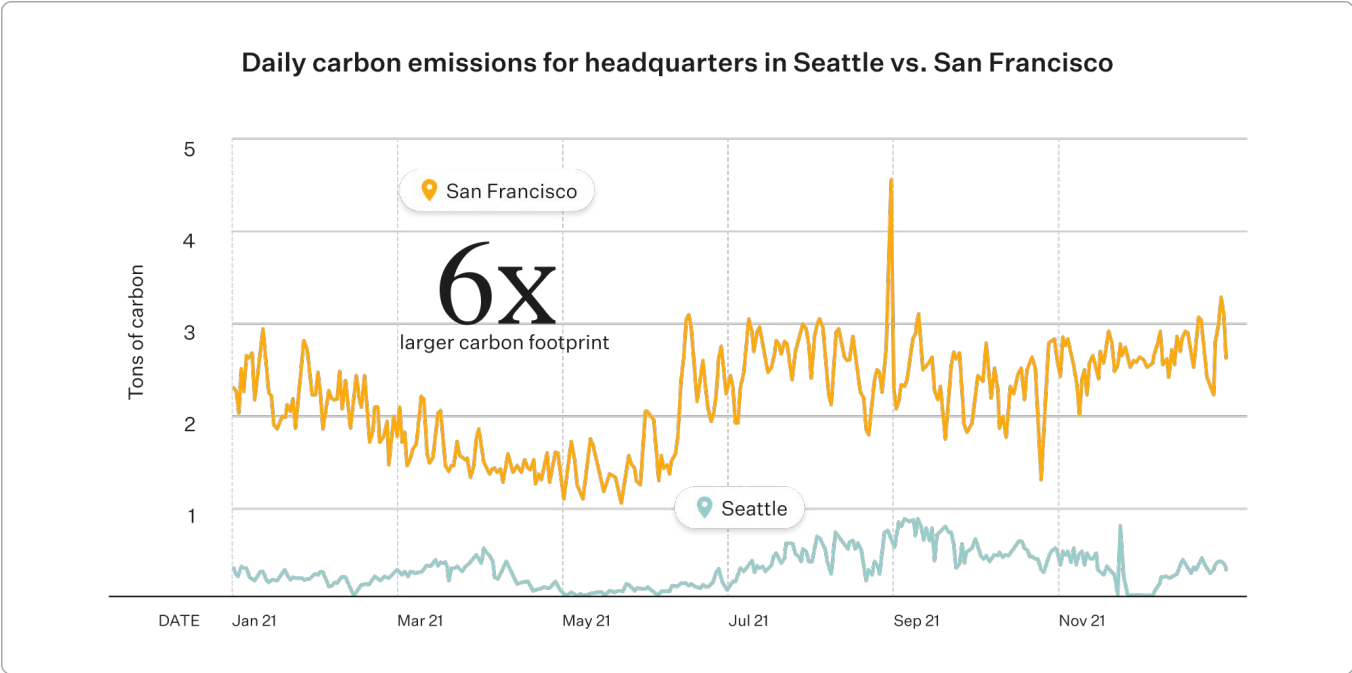
👍 Best time to charge  
12 AM - 4 AM

Intermediate time  
4 AM - 5 PM

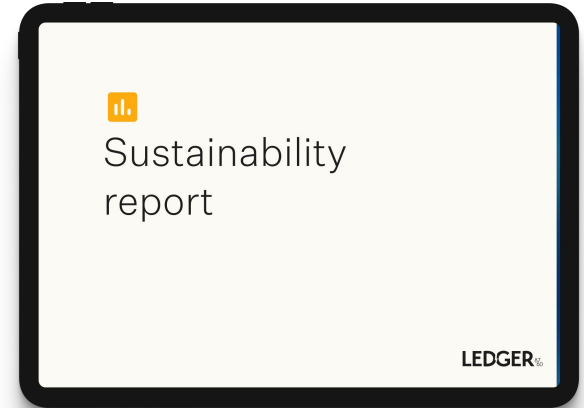
👎 Worst time to charge  
5 PM - 10 PM

Intermediate time  
10 PM - 12 AM

# And accurately tell your story



Creating reports is hard.  
Ledger makes it easy by  
pulling it all together for you





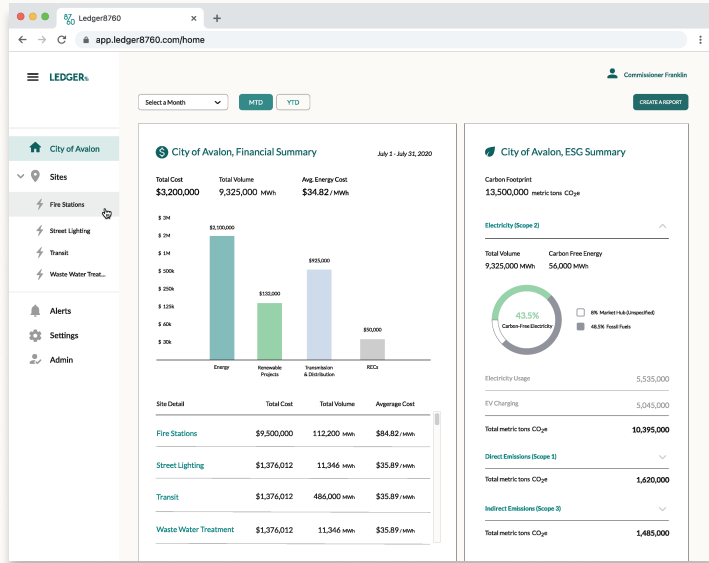
# LEDGER<sup>87/60</sup>

Your partner for carbon reduction



# LEDGER<sup>8760</sup>

PROVIDES SOFTWARE THAT REDUCES ENERGY COSTS & TRACKS CARBON FOOTPRINT



*You Can't Change What You Can't See.*

**LEDGER CREATED CARBON TOOLS**—The only software solution that measures Carbon Emissions and Energy Costs, reliably and on-demand. This software allows organizations to manage & disclose reliable & timely climate change data.

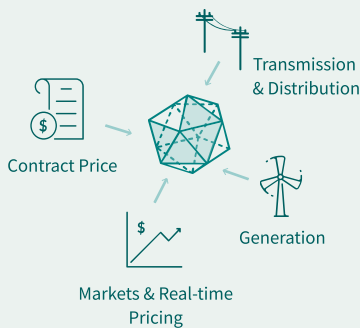
- 🌿 UPDATES IN REAL-TIME
- 🌿 UNIQUE, PATENT-PROTECTED TECHNOLOGY
- 🌿 UNMATCHED TRANSPARENCY
- 🌿 DATA ARRIVES IN TIME TO MAKE A DIFFERENCE
- 🌿 DE-RISK ENERGY & CARBON
- 🌿 REDUCE COSTS

*In our era of big data, conscientious energy consumers, and transformational tech—Ledger8760 powers the bottom line while advancing emission reduction goals.*

**Scope 1**—Direct emissions from customer-operated facilities and vehicle fleets

**Scope 2**—Emissions from electric consumption (Approx. 45% of all Carbon emissions)

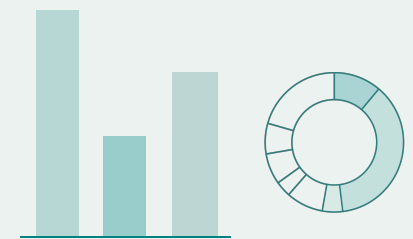
**Scope 3**—Indirect impacts (upstream & downstream emissions) within the value chain of an entity



Ledger automates data collection, and instantly calculates carbon impacts.



Ledger tracks hundreds of data points about hourly energy use. Accurate hourly calculation of carbon footprint and price risk.



Ledger automates data collection and calculates carbon impacts, water usage, and solid waste.

January 17, 2022

Name

Title

Via email

Dear XX:

Thank you for the opportunity to present this proposal to (Customer). The entire Ledger Team is looking forward to supporting your leadership in using data to make the most financially responsible operational decisions on behalf of (your customers, your shareholders, your constituents, your investors) while helping lower environmental impact from operations. The following proposal would leverage our cutting-edge proprietary energy, emissions and GhG-tracking platform to monitor and improve the Greenhouse Gas (GHG) profile of (Customer).

Ledger's innovative, patented technologies will enable your organization to establish environmental leadership by incorporating:

- A first-of-its-kind data ecosystem that simultaneously collects, protects, and displays energy, sustainability, and regulatory data to internal and external stakeholders;
- A sophisticated, easy-to-use platform that will synthesize Scope 1, 2, and known Scope 3 emissions data;
- Industry-leading methodologies for calculating the actual carbon content on a whole and sub-building basis
- Provide comprehensive data to identify areas for emission and cost reduction as well as a roadmap to utilize sustainability data; and
- A passionate, visionary team dedicated to providing efficient, intuitive solutions while reducing internal workload.

The following Order Form outlines how Ledger will provide these services. Unless accepted, the terms of this proposal shall expire 45 days after the date set forth above. We are excited to share our passion for tracking, understanding and using emissions data to achieve environmental, social, and regulatory goals, and look forward to the opportunity to work as your partner and achieve success together.

Thank you for your time and consideration,

Shawn Novak

**LEDGER<sup>8760</sup>**

Chief Revenue Officer

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All Order Forms incorporate the terms and conditions of the Master Subscription Agreement ([MSA](#)). Where applicable, the defined terms in the Master Subscription Agreement have the same meaning as in this Order Form

## Introduction + Order Form Overview

Ledger8760 ("Ledger") provides customers with critical data to understand their emissions impacts and ties this data to real-time pricing and risk metrics. Ledger provides SaaS driven, turn-key Greenhouse Gas

Emissions-tracking for all emissions sources identified by the Intergovernmental Panel on Climate Change (IPCC) to meet goals agreed to by the Paris Climate Accords and Glasgow Climate Pact. Ledger is an essential tool for entities that are serious about optimizing their own performance and leading by example toward a new, carbon-free future. Ledger’s Carbon Tool provides first-of-its kind, real-time visibility into the carbon content of an organization’s electric, gas, transportation, waste, and other emissions - a full-suite GhG risk management platform.

Ledger will provide the technology and services for automated data collection, analysis, and reporting. Ledger tracks meter and other consumption data, and communications with hardware, accounting, and building management systems. Included in this Order Form is system training and ongoing maintenance and support of the Ledger Platform. Ledger manages a 15-minute interval collection, where available, and can scale to hundreds of thousands of meters. Ledger creates a comprehensive data set through automated collection of data from meters and other systems that permits real-time and on-demand analysis of meter readings and empowers users to identify irregularities, including meter malfunction, free-flow energy leaks or anomalous data spikes. Ledger develops and implements data access strategies, including the negotiation of permissions from third parties holding customer data. Ledger provides transparent and customizable options communicating to internal or external stakeholders.

Ledger proposes to perform the following services:

- Thorough data collection of all emissions inputs, inclusive of available historical data
- Syncing, automation and streamlining of utility and process emissions’ data, as available, with the Ledger8760 platform
- Provide a holistic view of all GhG emissions metrics and associated costs
- Calculate and report greenhouse gas emissions, for most accurate carbon accounting
- Facilitate data-driven emissions management to increase operational efficiency
- Unprecedented 24/7 scope 2 emissions transparency
- Compare cost against sustainability metrics to optimize electric use
- Provide accrual estimates of utility bills for bill reconciliation
- Track, report and automate direct emissions, enterprise wide
- Collaborate with customer to build a strategy to track, report and automate Scope 3 emissions accounting
- Track energy, water, and gas demand
- Enable tracking of energy efficiency savings, expressed as both cost savings and carbon savings

## 5. Cost Proposal

Ledger will provide its SaaS via an ongoing monthly fee for the operation and maintenance of Ledger’s internal and external facing platforms for successive 12-month terms, beginning on the date you sign this Order Form. The pricing details are as follows, and will be in effect for the first three terms;

### Pricing Structure

One-Time Fees	Explanation	Cost
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Onboarding*	<p>Data service: Initial meeting between Ledger and customer to establish data input needs; jointly work with the customer's point of contact to identify each data input, which includes but is not limited to the following:</p> <ul style="list-style-type: none"> <li>● Electric Utilities</li> <li>● Natural Gas Utilities</li> <li>● Water Utilities</li> <li>● Waste Utilities</li> <li>● Vehicle Telematics Software</li> <li>● Solar Generation (where applicable)</li> <li>● BMS Software (where applicable)</li> <li>● Refrigerants (HVAC)</li> </ul> <p>Design and Organization: Once the data sources have been identified, logically organize the user interface to represent the data for operationally efficient decision making.</p> <p>Software and IT: Establish automated integration processes with each utility, onsite generation sources, BMS systems, and vehicle telematics software, where applicable, for ongoing data ingestion.</p>	\$22,000 (\$12,000)
Full Carbon Inventory (prior years)	If historic data is available	No Charge
Total for Onboarding	Due within ten (10) days of full execution of this Order Form	<b>\$10,000</b>
<b>Ongoing Monthly Fees</b>	<b>Explanation</b>	
Asset Data Fee p/Fixed Asset	Data storage and hosting, access, training, and technical support Data collection, upload, maintenance, and troubleshooting. Ongoing maintenance of and updates to Ledger8760 platform and public-facing site.	\$200/building/month
Subscription Fee	Subscription fee for Ledger Data Ecosystem™ Carbon Mapping and Ledger Carbon Tools™ Dashboard	\$3,000/mo (\$2,000)/mo
Other Services	Monthly and Annual GhG analytics, preparation of reports and learnings, forecasting and modeling.	TBD
Fixed Monthly Charge	Monthly charges will be invoiced at the beginning of each month and are due within 30 days of receipt. Invoices will be prorated for any partial months in which Services are used	<b>\$1,000 + \$200 p/building</b>
<p><i>*All costs of personnel are fully inclusive (including overhead, supplies, and benefits) at Ledger's below-market cost. Ledger will perform the proposed work within the budget set forth in this Order Form. Should you decide to install additional hardware to meet your needs in addition to the hardware proposed below, Ledger will cooperate and integrate with such hardware within the scope of this</i></p>		

*Order Form and the Master Subscription Agreement. The additional hardware shall be delivered pursuant to paragraph 6(b) of the Master Subscription Agreement, but the cost of the hardware may be subject to additional charges.*

### Proprietary Info Disclosures

Ledger8760 has created a proprietary carbon emissions data model that associates each kWh consumed by the customer with thousands of data points to build an hourly model of price and emissions data. This data model is built around publicly available data, and Ledger's internal dataset and proprietary modeling. Use of this data model and all other Ledger8760 technology will be subject to the terms of the Master Subscription Agreement and may not be used for any purpose outside of the deliverables contained herein.

**LEDGER**<sub>%</sub>

Signature: \_\_\_\_\_

By: \_\_\_\_\_

Title: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Date: \_\_\_\_\_

Counterparty \_\_\_\_\_

Signature: \_\_\_\_\_

By: \_\_\_\_\_

Title: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Date: \_\_\_\_\_