

Please see the below comments pertaining to the Oil & Gas Exploration & Production, Oil & Gas – Midstream, Electric Utilities & Power Generators and Gas Utilities & Distributors standards.

- EDF applauds the sections which call for specific methane breakouts for GHG disclosure. These metrics are increasingly important as investors become more engaged on methane management and disclosure.
- EDF asks for more disclosure of what measurement methodology a company uses to determine these methane breakout figures. Investors need to know how these figures were calculated in order to evaluate their precision and accuracy.
- EDF asks for stronger language encouraging the disclosure of activity metrics. Normalization allows investors to better compare company performance from year to year, and between different operators.
- EDF asks for more robust LDAR disclosure. There had previously been more robust LDAR language which is no longer included in the new draft standards. A comprehensive LDAR program is necessary for any good methane management program. While the downstream sector standards do at least ask for percentage of pipelines inspected, details on more than just scope, including methodology and frequency of inspections, are necessary for investors to evaluate an effective LDAR program.
  - The standards had previously included language asking for “The company’s strategy for leak detection and repair (LDAR) with respect to fugitive emissions/leaks, if the company has established a LDAR process.” EDF asks why this language was removed, and for it to be included in the final standards.
- EDF asks for the disclosure of methane-specific emissions targets, rather than general Scope I targets. Because methane poses such a specific reputational, regulatory and economic risk to operators, it requires a specific strategy and target for its reduction.
- EDF asks for stronger language encouraging disclosure on governance standards, such as management expertise in climate issues, or GHG reduction incentives. Good governance is key to effective GHG management.
- EDF hopes the recommendations for scenario analysis emphasize the need to account for all GHG emissions, including methane when informing long-term strategy.

Thank you.