

Laurel Peacock  
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RE: SASB Public Comment Period

## **Industry: Electric Utilities & Power Generators: SCIS IF0101**

### **General comments:**

NRG supports transparency in reporting that contributes directly to generating comparable and consistent data within an industry. However, in reporting SASB Standards there exists an unreasonable expectation to disclose complete prior year data in time for inclusion in a Form 10-K. Specifically for some of the environmental data, the timing with submitting for regulatory compliance may not be aligned with the Form 10-K publication. This may include time needed for a third-party assurance of these metrics. Propose examining other vehicles of communication for the SASB Standards, whether as a stand-alone report or included in broader sustainability reporting.

### **Industry description comments:**

Agree with the industry title change to include 'Power Generators'. However, even with the clarification of adding 'Power Generators' to the industry title, the 'Industry Description' seems to remain focused on electric utilities. Propose including a broader discussion of the electric power sector including the main market dynamics for each. Perhaps including a market description for power generators that describes the key differentiating factors with respect to public utilities vs. IPPs?

## **Disclosure Topic: Greenhouse Gas Emissions**

### **Accounting Metric Code: IF0101-01**

#### **Line of Disclosure: .04**

Comment: Propose clarification on this metric. Wouldn't 100% of all generation in the US be under a GHG limiting regulatory regime?

#### **Line of Disclosure: .05**

See comment above on .04. Is this specifically intended for non-US companies that are traded on the NYSE?

## **Disclosure Topic: Air Quality**

### **Accounting Metric Code: IF0101-04**

#### **Line of Disclosure: .30, bullet 3**

As discussed above, some of the data requested in this section would not be available for the FY in time to file the 10-K. PM reporting to the EPA is federally mandated due April 1. Thus, the prior FY data would likely not be available for the 10-K Filing.

Would it be decision useful to have the prior year's air quality data? This does not seem ideal. Again, propose examining other filings/reports for inclusion of SASB Standards that align with existing compliance and regulatory timelines.

### **Disclosure Topic: Water Management**

Description comments:

Electricity generation withdraws a great deal of water but does not necessarily consume it. This is an important distinction when evaluating water risk. To some readers this paragraph may imply that electricity generators *consume* the most water. Specifically the first sentence that states, "Electricity generation is the most water-intensive industry in the U.S." The electric power industry works very diligently to clarify the difference in metrics on water and "water-intensive" may be misleading. Propose clarifying language.

**Accounting Metric Code: IF0101-04**

**Lines of Disclosure: .40 - .42**

Comment: Propose reconsidering this metric. The WRI/WWF models may be inadequate as to the true risk to business continuity. Some see the probability of a false positive being high. Additionally, it does not differentiate between size and type of generating asset.

### **Disclosure Topic: Coal Ash Management**

Description comments:

Propose re-wording of opening description. The second sentence reads, "Coal ash is a major source of waste..." Wouldn't coal ash be waste by definition? The *burning* of coal is the source of waste.

**Accounting Metric Code: IF0101-08**

**Line of Disclosure: .55**

Comment: First sentence states, "CCRs are defined..." This is the only instance of the plural of CCR used in the draft. Propose changing it to "CCR material is" for parallel grammar structure

**Accounting Metric Code: IF0101-09**

**Line of Disclosure: .61**

Comment: Suggest putting in an extra column for 'incised' and an extra row for 'not applicable'. 'Incised' is an impoundment but not subject to assessment due to the fact that it does not have a dam. This table as it currently stands may be misaligned with the EPA classifications.

[Disclosure Topic: Workforce Health & Safety](#)

**Accounting Metric Code: IF0101-12**

**Line of Disclosure: .76**

Comment: Propose reconsidering denominator for rates. 1,000,000 is a commonly used rate for this metric. What is the rationale for 200,000?