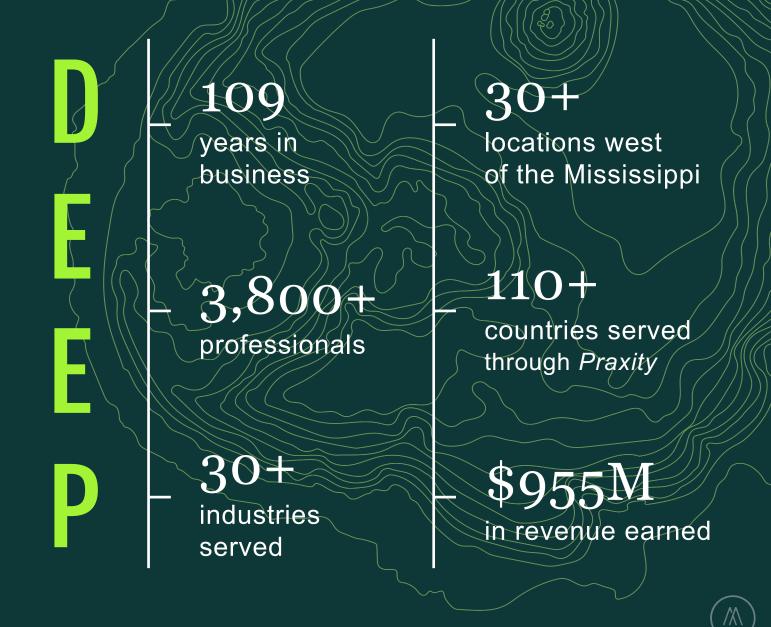


Environmental, Social, and Governance (ESG) Disclosure

Megan McFarland, CPA
Partner and Oil & Gas National Practice Leader
Moss Adams

Expertise

Crater Lake— A monument to perseverance, North America's deepest lake filled to 1,949 feet over 720 years.



Energy

Whether you're an oil and gas company, oilfield services, refining, utility, energy transition or a renewable energy company, your commitment to innovation drives progress. You realize the importance of staying ahead of the curve at every step of the business life cycle. As you pursue new possibilities, engaging a team that understands the specific challenges you face will allow you to concentrate on what really matters: growing your business.

Price fluctuations, cost containment, supply chain management, technological improvements, enhanced production demands, deregulation, environmental commitment and the need for capital—tackling these complex issues is what drives us.

WHO WE SERVE

Moss Adams serves over 900 energy companies of all sizes—from large multinational companies and publicly traded middle-market corporations to private firms and start-ups. We serve clients in many areas, including:

Oil & Gas

Power & Utilities

Renewable Energy

Energy flows through an ecosystem, while matter cycles within it. Moss Adams serves all aspects of the energy industry





ESG Solutions and Opportunities

SECURE STAKEHOLDER CONFIDENCE WITH ESG AUDITS OR REVIEWS

MAKE DATA-DRIVEN DECISIONS WITH DATA
ANALYTICS

STRENGTHEN AND ASSESS BOARD GOVERNANCE

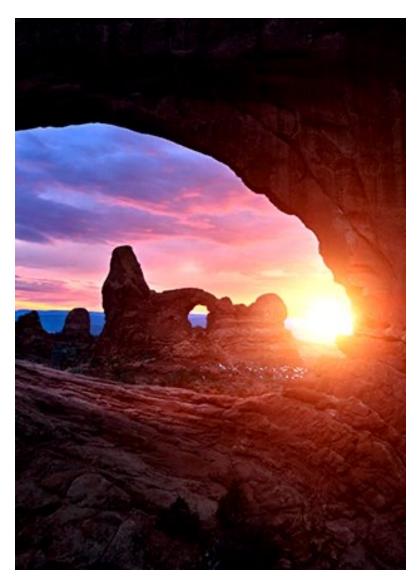
EXECUTE DEALS CONFIDENTLY WITH TRANSACTIONS SERVICES

CLAIM TAX BENEFITS FOR ESG PRACTICES

PURSUE ESG INVESTMENT OPPORTUNITIES

IMPROVE STRATEGY AND OPERATIONS





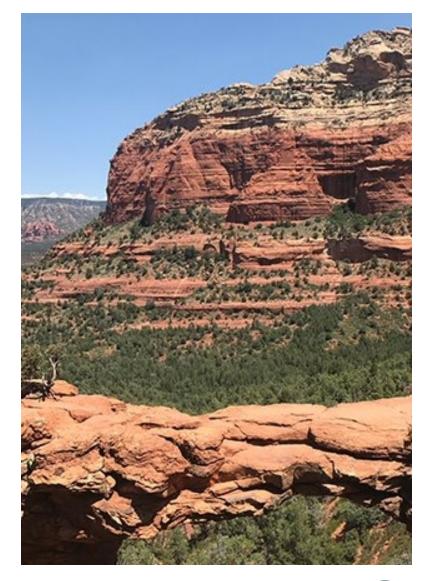
SEC Proposal – Financial Metrics

FINANCIAL METRIC PROPOSAL					
FINANCIAL IMPACT	EXPENDITURE	ESTIMATES & ASSUMPTIONS			
Impact of physical risks, transition risks; severe weather events; transition activities on any financial statement line item	-Expenditure expensed -Capitalized costs incurred Separately showing climate related events and transition activities to mitigate transition risks	Whether estimates and assumptions used to produce financials were impacted by risks & uncertainties or known impacts from climate related events - if so disclose how			
For same periods	as presented on balance sheet, EGC or SRC only 2 years re				
Materiality set at 1% of the total line item for the relevant year					



Some Key Takeaways

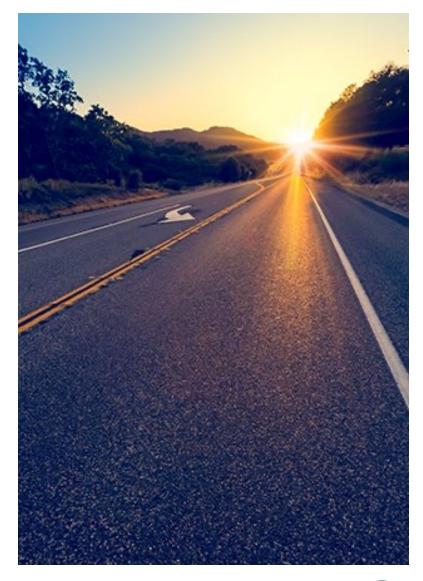
- These will be in a footnote, that means they are audited
- That means they are subject to ICFR
- There will be contextual information requirements how it was derived, significant inputs, assumptions etc.
- Consolidated subs would be included based on scope of registrants consolidation
- Accounting principles consistent with those used and disclosed in the filing
- Some limited consideration of "known and reasonably available"
- Lots of little intricacies here, and expect this to change before its finalized due to areas of requested comment

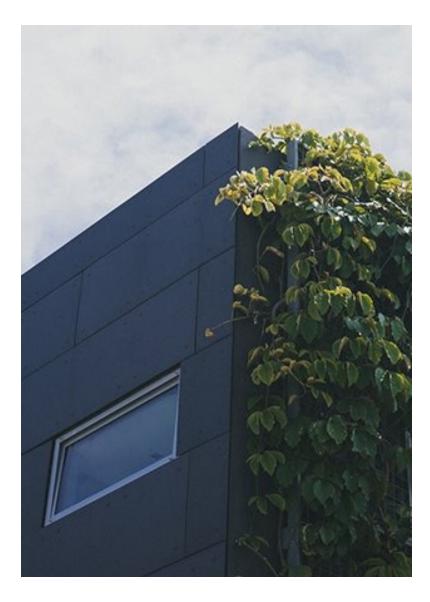




SEC Proposal – Attestation Required

- Limited assurance scaling to reasonable assurance for Scope 1 and Scope 2 GHG emissions:
 - (1) Limited assurance think Q review
 - (2) Reasonable assurance think audit
- Requires GHG emissions attestation provider
- Provides minimum requirements for the attestation report
- As proposed, does not require service provider to be a registered public accounting firm





GHG Attestation Provider Definition

- An expert in GHG emissions by virtue of having significant experience in measuring, analyzing, reporting, or attesting to GHG emissions. Significant experience means having sufficient competence and capabilities necessary to:
 - perform engagements in accordance with professional standards and applicable legal and regulatory requirements; and
 - enable the service provider to issue reports that are appropriate under the circumstances
- Is independent with respect to the registrant, and any of its affiliates, for whom it is providing the attestation report, during the attestation and professional engagement period.
- If a firm, expect policies and procedures designed to provide it with reasonable assurance that the personnel selected to conduct the GHG emissions attestation engagement have significant experience with respect to both attestation engagements and GHG disclosure

GHG Disclosure and Assurance Compliance Dates

FILER TYPE	SCOPES 1 AND 2 GHG DISCLOSURE	LIMITED	REASONABLE
	COMPLIANCE DATE	ASSURANCE	ASSURANCE
Large Accelerated	Fiscal year 2023 (filed in 2024)	Fiscal year 2024	Fiscal year 2026
Filer		(filed in 2025)	(filed in 2027)
Accelerated Filer	Fiscal year 2024	Fiscal year 2025	Fiscal year 2027
	(filed in 2025)	(filed in 2026)	(filed in 2028)

^{*}This table assumes the proposed rules will be adopted effective December 2022, and that the filer has a December 31 fiscal year-end.

Disclosure Compliance Dates by Registrant Type

REGISTRANT TYPE	DISCLOSURE COMPLIANCE DATE		
	All proposed disclosures, including GHG emissions metrics: Scope 1, Scope 2, and associated intensity metric, but excluding Scope 3	GHG emissions metrics: Scope 3 and associated intensity metric	
Large Accelerated Filer	Fiscal year 2023 (filed in 2024)	Fiscal year 2024 (filed in 2025)	
Accelerated Filer and Non-Accelerated Filer	Fiscal year 2024 (filed in 2025)	Fiscal year 2025 (filed in 2026)	
SRC	Fiscal year 2025 (filed in 2026)	Exempted	

^{*}This table assumes the proposed rules will be adopted effective December 2022, and that the filer has a December 31 fiscal year-end.



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