June 8, 2021

Honorable Gary Gensler
Chairman
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Public Input on Climate Change Disclosures

Respected Chair Gensler,

On behalf of Blue Dot Capital, I am pleased to submit our response to the SEC's request for public input on climate-related financial disclosures issued by Acting Chair Allison Herren Lee on March 15, 2021.

Blue Dot Capital is a boutique sustainable finance consultancy partnering with investment management firms to support the development of ESG capabilities and programs across asset classes. Our ESG advisory can be broadly categorized into the following: i) ESG Policy and Governance; ii) ESG Integration Frameworks and New Product; and iii) ESG Reporting and Stakeholder Communications.

Blue Dot Capital is an engaged member of the Sustainable Accounting Standards Board (SASB)'s Alliance. We would like to strongly support SASB's response - as articulated by SASB CEO Janine Guillot's letter submitted on May 19, 2021 - on recommended climate-related disclosures and broader sustainability disclosures.

In addition to the cogent reasoning provided by SASB in support of market-informed, industry-specific disclosures, I would like to add the following points specifically informed by our work with asset management firms that invest in (and engage with) small and mid-sized public companies as well as late-stage private companies:

1) A baseline of mandatory, financially-material climate-related disclosures allows companies of all sizes to develop meaningful, effective climate risk management processes. In the absence of such disclosure requirements, there is risk of larger firms producing resource-intensive, lengthy - but not necessarily material - information on climate change management. Climate change risks impact the widest swath of companies and the ability to institute effective climate controls should not just be the

prerogative of large companies. Nor should the effectiveness of climate change measures be conflated with a company's ability to produce elaborate climate-related information. By developing investment-grade climate change disclosures, the SEC will be able to provide strong, actionable guidance on key climate change metrics for adoption by companies of all sizes. (Question 4)

2) Investment management firms - and general investors - that invest in small and mid-sized companies should have visibility into a company's management of material climate risks and opportunities. Industry-specific, comparable climate-related disclosures will ensure that necessary climate information of requisite rigor is available for all companies that are impacted by climate change. (Questions 1 and 2)

3) We often interact with late-stage companies (either directly or through their private equity investors) and we encounter confusion about climate change management and reporting best practices. The confusion stems from their experience of receiving ad hoc questionnaires that are very often significantly divergent. We believe that mandatory climate-related disclosures from the SEC will go a long way in allaying these concerns and providing a clear pathway to mature private companies on climate risk management and measurement.

There is near-universal acknowledgment that climate change is the most cataclysmic challenge of our lifetimes. We greatly appreciate the opportunity to participate in the SEC's request for public input on a matter of critical significance to capital markets and the broader economy.

Thank you for your consideration.

Sincerely,
Sharadiya

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