

The Climate Accountability Scorecard

*Ranking Major Fossil Fuel Companies on
Climate Deception, Disclosure, and Action*
www.ucsusa.org/climatescorecard

Appendix: Supporting Fair and Effective Climate
Policies

© October 2016
All rights reserved

Scoring Guide

TABLE 1. Supporting Fair and Effective Climate Policies Scoring Guide

General Political Activity and Spending			
	CPA-Zicklin Index of Corporate Political Disclosure and Accountability scores. We condensed CPA-Zicklin scores into three categories—disclosure, policy, and oversight—with a company receiving a possible score of +2 – (-2) for each category.		
	Disclosure	Policy	Oversight
Advanced (+2)	+30 – +36	+14 – +16	+15 – +18
Good (+1)	+23 – +29	+11 – +13	+11 – +14
Fair (0)	+15 – +22	+6 – +10	+8 – +10
Poor (-1)	+7 – +14	+3 – +5	+4 – +7
Egregious (-2)	0 – +6	0 – +2	0 – +3
Direct Influence on Climate Policy			
Engagement with Congress on federal climate policies or legislation			
Good (+1)	Company consistently speaks in support of at least some existing or proposed climate policies or legislation; it calls for climate action in public engagement with Congress.		
Fair (0)	Company does not publicly engage Congress on climate policies or engages without supporting or opposing climate policy.		
Poor (-1)	Company publicly opposes congressional policy or action on climate and does not offer a specific, viable policy alternative that would have equal or greater benefit to the climate.		
Consistent support for US policy action to reduce carbon emissions			
Advanced (+2)	Company identifies specific US federal or state climate change policies (e.g., the EPA Clean Power Plan, California SB-350) that it supports and advocates publicly and consistently for these policies.		
Good (+1)	Company identifies a general category of US federal or state climate change policies that it supports (e.g., carbon tax) and maintains this position consistently across all platforms.		
Fair (0)	Company identifies a general category of climate policy that it supports (e.g., carbon tax) on the company website or in public statements.		
Poor (-1)	Company does not identify any climate policy that it supports on the company website in a prominent, easily accessible page (e.g., a page designated specifically to address climate change) or in public		

	statements.
Egregious (-2)	Company opposes US federal or state climate policies without identifying any policy that it supports and has used climate science disinformation as justification for its opposition.
Engagement on the EPA Clean Power Plan (EPA-HQ-OAR-2013-0602)	
Advanced (+2)	Company meets all of the criteria for “good” and advocated publicly for the EPA Clean Power Plan or a specific, viable policy alternative that would have equal or greater benefit to the climate as a policy solution to climate change.
Good (+1)	Company submitted comments to the EPA in support of the Clean Power Plan; or it submitted comments on EPA Clean Power Plan that did not express support for the policy, but presented a specific, viable policy alternative that would have equal or greater benefit to the climate.
Fair (0)	Company did not submit comments to the EPA regarding the Clean Power Plan.
Poor (-1)	Company submitted comments opposing the EPA Clean Power Plan and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate; or the company explicitly referenced and endorsed a trade association or industry group’s comments that opposed the EPA Clean Power Plan without presenting a specific, viable policy alternative; or the company, through an industry group, participated in a lawsuit against the EPA regarding the Clean Power Plan.
Egregious (-2)	Company submitted comments opposing the EPA Clean Power Plan and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate and used climate science disinformation as justification for opposition; or explicitly referenced and endorsed the statement of an industry group that used climate science disinformation as justification for opposition; or directly participated in a lawsuit against the EPA regarding the Clean Power Plan.
Engagement on the EPA methane rule (EPA-HQ-OAR-2010-0505-4776)	
Advanced (+2)	Company meets all of the criteria for “good” and advocated publicly for the EPA methane rule or a specific, viable policy alternative that would have equal or greater benefit to the climate as a policy solution to climate change.
Good (+1)	Company submitted comments in support of the EPA methane rule; or submitted comments on the EPA methane rule that did not express support for the policy, but presented a specific, viable policy alternative that would have equal or greater benefit to the climate.
Fair (0)	Company did not submit comments to the EPA regarding the methane rule.
Poor (-1)	Company submitted comments opposing the EPA methane rule and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate; or explicitly referenced and endorsed a trade association or industry group’s comments that opposed the EPA methane rule without presenting a specific, viable policy alternative.
Egregious (-2)	Company submitted comments opposing the EPA methane rule and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate and used climate science

	disinformation as justification for opposition; or explicitly referenced and endorsed the statement of a trade association or industry group that used climate science disinformation as justification for opposition.
Indirect Influence on Climate Policy	
Company influence through international or national business alliances or initiatives that are supportive of specific climate policies	
Good (+1)	Company signed on to business initiatives ¹ that demonstrate support for specific climate policies, such as the American Business Act on Climate Pledge, Trillion Ton Communiqué, the Paris Pledge for Action, the Guide for Responsible Corporate Engagement in Climate Policy, or the Oil and Gas Climate Initiative.
Fair (0)	Company has not signed onto any international or national business alliances or initiatives supportive of specific climate policies.
Poor (-1)	Company publicly rejects or disparages climate-supportive alliances or initiatives.

¹ Reference to these initiatives should not be considered an endorsement by UCS of any particular business initiative on climate change.

DATA SOURCES: COMPANY WEBSITES AND MAJOR NEWS SOURCES IN THE PERIOD JANUARY 1, 2014, TO MAY 31, 2016; 2015 CENTER FOR POLITICAL ACCOUNTABILITY-ZICKLIN INDEX AND SCORING GUIDELINES; CONGRESSIONAL TESTIMONY AND COMPANY COMMENTS FILED WITH REGULATIONS.GOV IN THE PERIOD JANUARY 1, 2014, TO MAY 31, 2016

TABLE 2. Supporting Fair and Effective Climate Policies Scoring Bands

Area Aggregate Score	Definition	Point range
Advanced	Company is demonstrating best practice in the area	+9 - +14
Good	Company is meeting emerging societal expectations in this area	+3 - +8
Fair	Company's performance in this area is neither positive nor negative	(-2) - +2
Poor	Company is falling short of emerging societal expectations in this area	(-8) - (-3)
Egregious	Company is acting very irresponsibly in this area	(-14) - (-9)

Arch Coal

CPA-ZICKLIN INDEX OF CORPORATE POLITICAL DISCLOSURE AND ACCOUNTABILITY SCORES

TABLE 3. CPA-Zicklin Index of Corporate Political Disclosure and Accountability Scores

	Zicklin Score	Description	Rationale
Disclosure	0	Egregious (-2)	The company does not disclose any information about its political activities.
Policy	0	Egregious (-2)	The company does not disclose any information about its political activities.
Oversight	0	Egregious (-2)	The company does not disclose any information about its political activities.

ENGAGEMENT WITH CONGRESS ON FEDERAL CLIMATE POLICIES OR LEGISLATION

SCORE:

Fair (0): Company does not publicly engage Congress on climate policies or engages without supporting or opposing climate policy.

RATIONALE:

Arch Coal did not publicly engage Congress on climate policies during the study period.

SOURCE DATA

Arch Coal did not publicly engage Congress on climate policies during the study period.

CONSISTENT SUPPORT FOR US FEDERAL POLICY ACTION TO REDUCE CARBON EMISSIONS

SCORE:

Poor (-1): Company does not identify any climate policy that it supports on the company website in a prominent, easily accessible page (e.g., a page designated specifically to address climate change) or in public statements.

RATIONALE:

Company states that it supports an “aggressive timeline for technology research and development that will reduce greenhouse gases from man-made sources,” but does not identify any specific policy (Arch Coal Inc. 2016).

SOURCE DATA

—On the policy side, Arch advocates an aggressive timeline for technology research and development that will reduce greenhouse gases from man-made sources, including the use of coal. On the operations side, Arch is continually evaluating how to reduce our own greenhouse gas emissions and increase the efficiency of our fuel use, while also assessing the most effective approaches for managing our business in a carbon-constrained economy” (Arch Coal Inc. 2016).

ENGAGEMENT ON THE EPA CLEAN POWER PLAN (EPA-HQ-OAR-2013-0602)**SCORE:**

Poor (-1): Company submitted comments opposing the Environmental Protection Agency Clean Power Plan and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate; or the company explicitly referenced and endorsed a trade association or industry group's comments that opposed the EPA Clean Power Plan without presenting a specific, viable policy alternative; or the company, through an industry group, participated in a lawsuit against the EPA regarding the Clean Power Plan.

RATIONALE:

The company submitted comments encouraging the EPA to request ~~that the agency withdraw its proposed plan~~ and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate (Arch Coal Inc. 2014a; Arch Coal Inc. 20147b).

SOURCE DATA

- —U.S. power plants are responsible for only four percent of global Green House Gas GHG emissions and EPA's proposal will reduce those emissions by less than a percent. If the United States totally eliminated coal-powered electric generation by 2017, the result would be a 1 percent reduction in atmospheric CO₂ concentrations and a 1/50th of one degree in warming in the year 2050." [...] —~~I~~ summary, EPA's proposal has no effective impact on reducing GHG emissions, imposes higher cost electricity on U.S. households and industry, and reduces the reliability of the grid. For these reasons, **Arch respectfully requests that the agency withdraw its proposed plan.** Thank you for your time and attention" (Arch Coal Inc. 2014b)
- —~~In~~ order to achieve meaningful reductions in global GHG emissions, carbon capture, utilization and storage (CCUS) technologies will be essential. Should EPA finalize both the proposed new source performance standards (NSPS) for GHG emissions and this proposed rule, **the resulting regulatory regime will further damage the domestic coal-fueled power generation fleet to the point where there is little or no incentive to pursue CCS/CCUS technology development.** The end result will be that the U.S. will miss the opportunity to develop and export such technology and to facilitate CCS/CCUS deployment worldwide" (Arch Coal Inc. 2014b)

ENGAGEMENT ON THE EPA METHANE RULE (EPA-HQ-OAR-2010-0505-4776)**SCORE:**

Fair (0): Company did not submit comments to the EPA regarding the methane rule.

RATIONALE:

The company did not submit comments to the EPA regarding the methane rule.

SOURCE DATA

The company did not submit comments to the EPA regarding the methane rule.

COMPANY INFLUENCE THROUGH INTERNATIONAL OR NATIONAL BUSINESS ALLIANCES OR INITIATIVES THAT ARE SUPPORTIVE OF SPECIFIC CLIMATE POLICIES**SCORE:**

Fair (0): Company has not signed onto any international or national business alliances or initiatives supportive of specific climate policies.

RATIONALE:

The company has not signed on to international or national business alliances or initiatives supportive of specific climate policies.

ARCH COAL CONTINUED

SOURCE DATA

The company has not signed on to international or national business alliances or initiatives supportive of specific climate policies.

SUPPORTING FAIR AND EFFECTIVE CLIMATE POLICIES SCORE: POOR (-8)

BP

CPA-ZICKLIN INDEX OF CORPORATE POLITICAL DISCLOSURE AND ACCOUNTABILITY SCORES

TABLE 4. CPA-Zicklin Index of Corporate Political Disclosure and Accountability Scores

	Zicklin Score	Description	Rationale
Disclosure	18	Fair (0)	BP's policy is not to make political contributions from corporate funds and not to give to candidates, parties, and committees. It provides partial disclosure or no disclosure of other aspects of political spending. For example, the company does not disclose payments to trade associations or other tax-exempt organizations such as 501(c)4s that the recipient organization may use for political purposes, and does not disclose a list of the amounts and recipients of payments made by trade associations or other tax-exempt organizations of which the company is either a member or a donor.
Policy	16	Advanced (+2)	The company's policy is not to make political contributions from corporate funds and not to give to candidates, parties, and committees.
Oversight	4	Poor (-1)	The company's policy is not to make political contributions from corporate funds and not to give to candidates, parties, and committees. It has partial or no oversight in other areas related to political spending. For example, the company does not have a specified board committee that reviews the company's payments to trade associations and other tax-exempt organizations that may be used for political purposes.

DATA SOURCES: BP PLC 2016B; BP PLC 2012

ENGAGEMENT WITH CONGRESS ON FEDERAL CLIMATE POLICIES OR LEGISLATION

SCORE:

Fair (0): Company does not publicly engage Congress on climate policies or engages without supporting or opposing climate policy.

RATIONALE:

BP did not publicly engage Congress on climate policies during the study period.

SOURCE DATA

BP did not publicly engage Congress on climate policies during the study period.

CONSISTENT SUPPORT FOR US FEDERAL POLICY ACTION TO REDUCE CARBON EMISSIONS

SCORE:

Fair (0): Company identifies a general category of climate policy that it supports (e.g., carbon tax) on the company website or in public statements.

RATIONALE:

The company consistently calls for a government carbon policy framework, including a price on carbon, as a policy it supports (BP PLC 2016).

SOURCE DATA

—BP believes that the scale of the climate challenge is such that governments must act by setting a clear, stable and effective carbon policy framework if energy companies are to limit GHGs while providing energy competitively. In particular, we believe that putting a price on carbon – one that treats all carbon equally, whether it comes out of a smokestack or a car exhaust – will make energy efficiency more attractive and lower-carbon energy sources more competitive. Within a clear policy framework energy companies have a key role to deploy innovative technological and commercial solutions at scale and BP wants to play its part. As such, we have endorsed the World Bank carbon pricing statement and the Carbon Price Communique. BP is also a member of the Oil and Gas Climate Initiative, an industry-driven platform for sharing best practice and technical solutions to address climate change and sustainable energy. **BP believes it is for governments to set goals, targets and timetables for limiting GHG emissions and to identify how best to achieve them.** We encourage governments to base their discussions on sound science and consideration of all relevant factors, including energy security, affordability and international competitiveness.” (BP PLC 2016)

ENGAGEMENT ON THE EPA CLEAN POWER PLAN (EPA-HQ-OAR-2013-0602)

SCORE:

Fair (0): Company did not submit comments to the EPA regarding the Clean Power Plan.

RATIONALE:

The company did not submit comments to the EPA regarding the Clean Power Plan.

SOURCE DATA

The company did not submit comments to the EPA regarding the Clean Power Plan.

ENGAGEMENT ON THE EPA METHANE RULE (EPA-HQ-OAR-2010-0505-4776)

SCORE:

Good (+1): Company submitted comments in support of the EPA methane rule; or submitted comments on the EPA methane rule that did not express support for the policy, but presented a specific, viable policy alternative that would have equal or greater benefit to the climate.

RATIONALE:

The company submitted comments on the EPA methane rule, but only suggested technical changes (it criticized a technology-specific paradigm). It did not oppose the rule directly (BP PLC 2015).

SOURCE DATA

—AEP is aware, these LDAR requirements are not flexible and will be very costly and labor-intensive to implement. Application of conventional LDAR approaches to onshore natural gas production wells is particularly difficult, cumbersome and expensive. Unlike refineries or other plant environments where LDAR requirements have more traditionally been applied, the proposed rule would now mandate the testing of literally tens of thousands of well components at many thousands of wells, widely dispersed and often located at remote sites across thousands of miles. Costs include the up-front investment in OGI cameras and related equipment but, even more significantly, the training of staff in the proper operation of the equipment (to avoid the false negatives and positives that can easily occur) and the implementation of the program across the wide span of natural gas production sites. The time and resources required to

conduct this monitoring will be significant and the training and recordkeeping burdens will be substantial, as will the enforcement burden to the Agency.” [...] —So that these technologies can be quickly deployed, **EPA should build into its final rule an ‘on-ramp’ mechanism for rapid introduction of new detection equipment and monitoring strategies once they are validated and shown to be effective.** This should include a streamlined, fast-track review process, with firm deadlines for decision-making written into the rule, assuring that alternatives to the current LDAR requirements can be approved without time-consuming amendments to the NSPS or other potentially complex and cumbersome processes that could inhibit the rapid development and deployment of such technologies” (BP PLC 2015).

COMPANY INFLUENCE THROUGH INTERNATIONAL OR NATIONAL BUSINESS ALLIANCES OR INITIATIVES THAT ARE SUPPORTIVE OF SPECIFIC CLIMATE POLICIES

SCORE:

Good (+1): Company signed on to business initiatives that demonstrate support for specific climate policies, such as the American Business Act on Climate Pledge, Trillion Ton Communiqué, the Paris Pledge for Action, the Guide for Responsible Corporate Engagement in Climate Policy, or the Oil and Gas Climate Initiative.

RATIONALE:

The company is a member of the Oil and Gas Climate Initiative (OGCI 2015).

SOURCE DATA

—The members of the Oil and Gas Climate Initiative (OGCI) welcome and support the historic result achieved by 195 nations at the 21st Conference of the Parties (COP21).

In alignment with the Paris Agreement, the OGCI’s Joint Declaration issued October 2015 recognized the general ambition to limit global average temperature rise to less than 2°C, and that the current trend of the world’s net greenhouse gas (GHG) emissions is not consistent with this ambition. The Paris Agreement, which strives to limit the global average temperature rise to well below 2°C, offers the world a clear signal that will help all actors to take actions and make investments towards a lower carbon future. The OGCI believes that this offers significant opportunity for innovation and investments in lower GHG emission solutions” (OGCI 2015).

SUPPORTING FAIR AND EFFECTIVE CLIMATE POLICIES SCORE: GOOD (+3)

Chevron

CPA-ZICKLIN INDEX OF CORPORATE POLITICAL DISCLOSURE AND ACCOUNTABILITY SCORES

TABLE 5. CPA-Zicklin Index of Corporate Political Disclosure and Accountability Scores

	Zicklin Score	Description	Rationale
Disclosure	17	Fair (0)	<p>Chevron publicly discloses:</p> <ul style="list-style-type: none"> • Corporate contributions to political candidates, parties, and committees • Payments to 527 groups, such as governors associations and super PACs (political action committees) • Payments made to influence the outcome of ballot measures • The positions and/or titles of Chevron's the company's senior managers who have final authority over the company's Chevron's political spending decisions <p>The company provides partial disclosure or no disclosure of other aspects of political spending (CPA 2015).</p>
Policy	14	Advanced (+2)	<p>Chevron publicly describes or makes available:</p> <ul style="list-style-type: none"> • Detailed policy governing its political expenditures from corporate funds • Public policy positions that become the basis for its spending decisions with corporate funds • Policy requiring senior managers to oversee and have final authority over all of the company's political spending • Policy that the board of directors regularly oversees the company's corporate political activity <p>It has a partial policy or no policy in other areas related to political spending (CPA 2015).</p>

Oversight	11	Good (+1)	<p>The company has (a) specified board(s) or committee(s) that:</p> <ul style="list-style-type: none"> Review the company's policy on political expenditures Reviews the company's political expenditures made with corporate funds Oversees its political activity (composed entirely of outside directors) <p>The company has:</p> <ul style="list-style-type: none"> Dedicated political disclosure web page accessible within three mouse-clicks from the homepage and through an internet search <p>It has partial or no oversight in other areas related to political spending (CPA 2015).</p>
-----------	----	-----------	--

DATA SOURCES: CPA 2015

ENGAGEMENT WITH CONGRESS ON FEDERAL CLIMATE POLICIES OR LEGISLATION

SCORE:

Fair (0): Company does not publicly engage Congress on climate policies or engages without supporting or opposing climate policy.

RATIONALE:

Chevron did not publicly engage Congress on climate policies during the study period.

SOURCE DATA

Chevron did not publicly engage Congress on climate policies during the study period.

CONSISTENT SUPPORT FOR US FEDERAL POLICY ACTION TO REDUCE CARBON EMISSIONS

SCORE:

Poor (-1): Company does not identify any climate policy that it supports on the company website in a prominent, easily accessible page (e.g., a page designated specifically to address climate change) or in public statements.

RATIONALE:

The company's statements on climate policy mention "government" generically and emphasize that global action is necessary, but warn against unintended consequences of an international price on carbon and of unilateral action by any country or jurisdiction. The company has not expressed support for US federal or state policy action (Chevron Corporation 2016).

SOURCE DATA

- There are large-scale, proven and affordable technologies available today that can be applied to lower or reduce the growth of global GHGs. Natural gas, energy efficiency, and nuclear technologies can be implemented immediately to help reduce GHG emissions while innovative research continues. This also may include unsubsidized wind energy in jurisdictions where large-scale development can be achieved. Government must enable the development and application of these energy technologies by removing barriers to access, streamlining permitting and ensuring responsible and cost-effective regulation." [...]
- Reducing greenhouse gas (GHG) emissions is a global issue that requires global engagement and action. GHGs do not recognize sovereign borders. Climate change risks stem from the cumulative effect of GHG emissions from all nations. By 2025, about one-third of global energy-related GHG emissions are projected to come from OECD* nations and two-thirds from non-OECD nations – the single largest being China accounting for nearly 30 percent of projected global energy-related

GHG emissions. With emissions rising fastest in the broader developing world, climate change risks cannot be addressed by actions taken in the developed world alone. Global engagement is required. **Unilateral action by any country or jurisdiction could result in unintended consequences that could distort markets, reduce competitiveness of trade-exposed industries and undermine intended environmental objectives – without reducing climate change risks to that country or jurisdiction**” (Chevron Corporation 2016).

- And while Watson praised last year’s international climate agreement in Paris as a good first step, **he argued that any attempt to set an international price for carbon dioxide emissions would hurt the world’s poor**, who need affordable energy to improve their lives. “When people talk about a price on carbon, you’re talking about raising the price of energy—you’re talking about raising the price of everything you consume” he told reporters at Chevron’s San Ramon headquarters. “The people arguing for a price on carbon should be prepared to say what they’re willing to live without” (Baker 2016).

ENGAGEMENT ON THE EPA CLEAN POWER PLAN (EPA-HQ-OAR-2013-0602)

SCORE:

Fair (0): Company did not submit comments to the EPA regarding the Clean Power Plan.

RATIONALE:

The company did not submit comments to the EPA regarding the Clean Power Plan.

SOURCE DATA

The company did not submit comments to the EPA regarding the Clean Power Plan.

ENGAGEMENT ON THE EPA METHANE RULE (EPA-HQ-OAR-2010-0505-4776)

SCORE:

Poor (-1): Company submitted comments opposing the EPA methane rule and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate; or explicitly referenced and endorsed a trade association or industry group's comments that opposed the EPA methane rule without presenting a specific, viable policy alternative.

RATIONALE:

The company explicitly referenced and endorsed an industry association or trade group's comments that opposed the EPA methane rule and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate (Chevron Corporation 2015).

SOURCE DATA

—As a member of the American Petroleum Institute (API), we strongly support and adopt the comments submitted by API. We would like to reinforce API’s position that, for the exploration and production sector, there are no emissions reduction benefits from regulating methane in addition to volatile organic compounds (VOCs)” (Chevron Corporation 2015).

COMPANY INFLUENCE THROUGH INTERNATIONAL OR NATIONAL BUSINESS ALLIANCES OR INITIATIVES THAT ARE SUPPORTIVE OF SPECIFIC CLIMATE POLICIES

SCORE:

Fair (0): Company has not signed onto any international or national business alliances or initiatives supportive of specific climate policies.

RATIONALE:

The company has not signed on to international or national business alliances or initiatives supportive of specific climate policies.

SOURCE DATA

The company has not signed on to international or national business alliances or initiatives supportive of specific climate policies.

SUPPORTING FAIR AND EFFECTIVE CLIMATE POLICIES SCORE: FAIR (+1)

CPA-ZICKLIN INDEX OF CORPORATE POLITICAL DISCLOSURE AND ACCOUNTABILITY SCORES

TABLE 6. CPA-Zicklin Index of Corporate Political Disclosure and Accountability Scores

	Zicklin Score	Description	Rationale
Disclosure	29	Good (+1)	<p>ConocoPhillips publicly discloses:</p> <ul style="list-style-type: none"> • Corporate contributions to political candidates, parties, and committees • Payments to 527 groups, such as governors associations and super PACs (political action committees) • Independent political expenditures made in direct support of or opposition to a political campaign • Payments to other tax-exempt organizations, such as 501(c)(4)s, that the recipient may use for political purposes • Payments made to influence the outcome of ballot measures, including recipient names and amounts given • The positions and/or titles of the company’s senior managers who have final authority over ConocoPhillips’s political spending decisions <p>The company provides partial disclosure or no disclosure of other aspects of political spending (CPA 2015).</p>
Policy	15	Advanced (+2)	<p>ConocoPhillips publicly describes or makes available:</p> <ul style="list-style-type: none"> • Detailed policy governing its political expenditures from corporate funds • Policy stating that all of its contributions will promote the interests of the company and will be made without regard for the private political preferences of executives • The types of entities considered to be proper recipients of the company’s political spending • Policy requiring senior managers to oversee and have final authority over all of the company’s political spending • Policy that the board of directors regularly oversees the company’s corporate political activity <p>It has a partial policy or no policy in other areas related to political spending (CPA 2015).</p>

<p>Oversight</p>	<p>17</p>	<p>Advanced (+2)</p>	<p>The company has (a) specified board(s) or committee(s) that:</p> <ul style="list-style-type: none"> • Review the company’s policy on political expenditures • Review the company’s political expenditures made with corporate funds • Approve political expenditures from corporate funds • Oversee the company’s political activity (composed entirely of outside directors) <p>The company has:</p> <ul style="list-style-type: none"> • A detailed report on its website covering its political spending with corporate funds semiannually • A dedicated political disclosure webpage accessible within three mouse-clicks from the homepage and through an internet search • An internal process for or an affirmative statement on ensuring compliance with its political spending policy <p>It has partial or no oversight in other areas related to political spending (CPA 2015).</p>
------------------	-----------	----------------------	---

DATA SOURCES: CPA 2015

ENGAGEMENT WITH CONGRESS ON FEDERAL CLIMATE POLICIES OR LEGISLATION

SCORE:

Fair (0): Company does not publicly engage Congress on climate policies or engages without supporting or opposing climate policy.

RATIONALE:

ConocoPhillips did not publicly engage Congress on climate policies during the study period.

SOURCE DATA

ConocoPhillips did not publicly engage Congress on climate policies during the study period.

CONSISTENT SUPPORT FOR US FEDERAL POLICY ACTION TO REDUCE CARBON EMISSIONS

SCORE:

Poor (-1): Company does not identify any climate policy that it supports on the company website in a prominent, easily accessible page (e.g., a page designated specifically to address climate change) or in public statements.

RATIONALE:

The company opposes policies such as the EPA’s methane rule without identifying any category of climate policy that it supports (Dlouhy 2015).

SOURCE DATA

- — We believe that effective climate change policy must be aligned with the following principles:
 - Recognize that climate change is a global issue which requires global solutions — economy-wide governmental GHG management frameworks should be linked to binding international agreements comprising the major GHG contributors

CONOCOPHILLIPS CONTINUED

- Result in the stabilization of global GHG atmospheric concentrations at safe levels
- Coordinate with energy policy to ensure a diverse and secure supply of affordable energy
- Utilize market-based mechanisms rather than technology mandates
- Create a level competitive playing field among energy sources and between countries
- Avoid overlapping or duplicating existing energy and climate change programs
- Provide long-term certainty for investment decisions
- Promote government and private sector investment in energy research and development
- Match the pace at which new technology can be developed and deployed
- Encourage efficient use of energy
- Foster resiliency to the impacts of a changing climate
- Avoid undue harm to the economy.

Building balanced energy policies is challenging, and we recognize that no one has all the answers. As economies around the world continue to develop, fossil fuels will play an important role in meeting the growing global demand for energy. Meeting the challenge of taking action on climate change while providing adequate, affordable supplies of reliable energy will require financial investments, skilled people, technical innovation and responsible stewardship from policy makers, energy producers and consumers. We are committed to doing our part” (ConocoPhillips 2016).

- —Speaking in Washington, D.C., on Wednesday, ConocoPhillips CEO Ryan Phillips said he is also **disappointed the emphasis is on regulation...** “The industry is already doing a lot of things to voluntarily deal with the methane emissions problem,” he said” (Dlouhy 2015).

ENGAGEMENT ON THE EPA CLEAN POWER PLAN (EPA-HQ-OAR-2013-0602)

SCORE:

Fair (0): Company did not submit comments to the EPA regarding the Clean Power Plan.

RATIONALE:

The company did not submit comments to the EPA regarding the Clean Power Plan.

SOURCE DATA

The company did not submit comments to the EPA regarding the Clean Power Plan.

ENGAGEMENT ON THE EPA METHANE RULE (EPA-HQ-OAR-2010-0505-4776)

SCORE:

Poor (-1): Company submitted comments opposing the EPA methane rule and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate; or explicitly referenced and endorsed a trade association or industry group's comments that opposed the EPA methane rule without presenting a specific, viable policy alternative.

RATIONALE:

The company submitted comments opposing the EPA methane rule, explicitly referenced and endorsed trade associations' comments that opposed the rule, and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate (ConocoPhillips 2014).

SOURCE DATA

—As a member of American Petroleum Institute (API) and Gas Processors Association (GPA), ConocoPhillips supports and endorses the comments submitted by those organizations on this regulatory action. We believe EPA must evaluate what minimum records, notifications, or reports are necessary to demonstrate compliance with a performance standard or work practice that has an associated benefit for reducing VOC emissions or maintaining air quality, and impose only those” (ConocoPhillips 2014).

COMPANY INFLUENCE THROUGH INTERNATIONAL OR NATIONAL BUSINESS ALLIANCES OR INITIATIVES THAT ARE

SUPPORTIVE OF SPECIFIC CLIMATE POLICIES

SCORE:

Fair (0): Company has not signed onto any international or national business alliances or initiatives supportive of specific climate policies.

RATIONALE:

The company has not signed on to international or national business alliances or initiatives supportive of specific climate policies.

SOURCE DATA

The company has not signed on to international or national business alliances or initiatives supportive of specific climate policies.

SUPPORTING FAIR AND EFFECTIVE CLIMATE POLICIES SCORE: GOOD (+3)

CONSOL Energy

CPA-ZICKLIN INDEX OF CORPORATE POLITICAL DISCLOSURE AND ACCOUNTABILITY SCORES

TABLE 7. CPA-Zicklin Index of Corporate Political Disclosure and Accountability Scores

	Zicklin Score	Description	Rationale
Disclosure	5	Egregious (-2)	<ul style="list-style-type: none"> CONSOL Energy publicly discloses the company’s senior managers (by position/title of the individuals involved) who have final authority over the company’s political spending decisions. The company provides partial disclosure or no disclosure of other aspects of political spending (CPA 2015).
Policy	10	Fair (0)	<p>CONSOL Energy publicly makes available:</p> <ul style="list-style-type: none"> The types of entities considered to be proper recipients of the company’s political spending Policy requiring senior managers to oversee and have final authority over all of the company’s political spending Policy that the board of directors regularly oversees the company’s corporate political activity <p>The company has partial or no policy in other areas related to political spending (CPA 2015).</p>
Oversight	10	Fair (0)	<p>CONSOL Energy has:</p> <ul style="list-style-type: none"> A specified board committee that reviews the company’s political expenditures made with corporate funds A specified board committee that reviews the company’s payments to trade associations and other tax-exempt organizations that may be used for political purposes A specified board committee, composed entirely of outside directors, that oversees its political activity An internal process for or an affirmative statement on ensuring compliance with its political spending policy <p>The company has partial or no oversight in other areas related to political spending (CPA 2015).</p>

DATA SOURCES: CPA 2015

ENGAGEMENT WITH CONGRESS ON FEDERAL CLIMATE POLICIES OR LEGISLATION

SCORE:

Fair (0): Company does not publicly engage Congress on climate policies or engages without supporting or opposing climate policy.

RATIONALE:

CONSOL Energy did not publicly engage Congress on climate policies during the study period.

SOURCE DATA

CONSOL Energy did not publicly engage Congress on climate policies during the study period.

CONSISTENT SUPPORT FOR US FEDERAL POLICY ACTION TO REDUCE CARBON EMISSIONS**SCORE:**

Poor (-1): Company does not identify any climate policy that it supports on the company website in a prominent, easily accessible page (e.g., a page designated specifically to address climate change) or in public statements.

RATIONALE:

CONSOL Energy does not identify any federal or state climate policy that the company supports on the company website in a prominent, easily accessible page (for example, a page designated specifically to address climate change), or in public statements.

SOURCE DATA

No discussion of climate on website and no public statements on climate policy during the study period.

ENGAGEMENT ON THE EPA CLEAN POWER PLAN (EPA-HQ-OAR-2013-0602)**SCORE:**

Poor (-1): Company submitted comments opposing the EPA Clean Power Plan and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate; or the company explicitly referenced and endorsed a trade association or industry group's comments that opposed the EPA Clean Power Plan without presenting a specific, viable policy alternative; or the company, through an industry group, participated in a lawsuit against the EPA regarding the Clean Power Plan.

RATIONALE:

The company submitted comments encouraging the EPA to “~~withdraw~~ this rule and abandon its attempt to remake the US electricity system by a misguided and highly flawed executive fiat” and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate (CONSOL Energy Inc. 2014).

SOURCE DATA

~~EPA should withdraw this rule~~ and abandon its attempt to remake the US electricity system by a misguided and highly flawed executive fiat, and limit itself, at most, to allowing the states to determine what reductions can be made through realistic efficiency improvements on a case-by-case basis at individual existing sources” (CONSOL Energy Inc. 2014).

ENGAGEMENT ON THE EPA METHANE RULE (EPA-HQ-OAR-2010-0505-4776)**SCORE:**

Poor (-1): Company submitted comments opposing the EPA methane rule and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate; or explicitly referenced and endorsed a trade association or industry group's comments that opposed the EPA methane rule without presenting a specific, viable policy alternative.

RATIONALE:

The company submitted comments opposing the methane rule, calling it an “unnecessary burden on the oil and gas industry,” and did not present a specific, viable policy alternative that would be equal to greater benefit to the climate (CONSOL Energy Inc. 2015).

SOURCE DATA

“EPA acknowledges within the proposed rule that total U.S. oil and natural gas production, processing, and transmission make up only 0.3 percent of the total global greenhouse gas emissions and that methane emissions from this industry have declined by over 13 percent since 2008. EPA also states that the best system of emissions reduction (BSER) for methane is same as that for volatile organic compounds (VOCs), so the control techniques in the proposed new source performance standards (NSPS) for the oil and natural gas source category will not actually change. Based on the statements above, CONSOL believes that this additional regulation is an unnecessary burden on the oil and natural gas industry and offers no substantial environmental benefits. Therefore, we recommend that EPA withdraw the proposed rule. While CONSOL is in support of improving air quality and reducing greenhouse gas emissions, we request an additional sixty days to more thoroughly review the proposed new emissions standards” (CONSOL Energy Inc. 2015).

COMPANY INFLUENCE THROUGH INTERNATIONAL OR NATIONAL BUSINESS ALLIANCES OR INITIATIVES THAT ARE SUPPORTIVE OF SPECIFIC CLIMATE POLICIES

SCORE:

Fair (0): Company has not signed onto any international or national business alliances or initiatives supportive of specific climate policies.

RATIONALE:

CONSOL Energy has not signed on to international or national business alliances or initiatives supportive of specific climate policies.

SOURCE DATA

CONSOL Energy has not signed on to international or national business alliances or initiatives supportive of specific climate policies.

SUPPORTING FAIR AND EFFECTIVE CLIMATE POLICIES SCORE: POOR (-5)

ExxonMobil

CPA-ZICKLIN INDEX OF CORPORATE POLITICAL DISCLOSURE AND ACCOUNTABILITY SCORES

TABLE 8. CPA-Zicklin Index of Corporate Political Disclosure and Accountability Scores

	Raw Score	Description	Rationale
Disclosure	12	Poor (-1)	<p>ExxonMobil publicly discloses:</p> <ul style="list-style-type: none"> • Corporate contributions to political candidates, parties, and committees • Payments to 527 groups such as governors associations and super PACS (political action committees) • The positions and/or titles of the company's senior managers who have final authority over ExxonMobil's political spending decisions <p>The company provides partial disclosure or no disclosure of other aspects of political spending (CPA 2015).</p>
Policy	14	Advanced (+2)	<p>ExxonMobil publicly describes or makes available:</p> <ul style="list-style-type: none"> • Detailed policy governing its political expenditures from corporate funds • The types of entities considered to be proper recipients of the company's political spending • Public policy positions that become the basis for its spending decisions with corporate funds • Policy requiring senior managers to oversee and have final authority over all of the company's political spending • Policy that the board of directors regularly oversees the company's corporate political activity <p>It has a partial policy or no policy in other areas related to political spending (CPA 2015).</p>
Oversight	9	Fair (0)	<p>ExxonMobil has a specified board committee composed entirely of outside directors that oversees its political activity.</p> <p>The company has a dedicated political disclosure webpage accessible within three mouse-clicks from the homepage and through an internet search.</p> <p>It has partial or no oversight in other areas related to political spending (CPA 2015).</p>

DATA SOURCES CPA 2015

ENGAGEMENT WITH CONGRESS ON FEDERAL CLIMATE POLICIES OR LEGISLATION

SCORE:

Fair (0): Company does not publicly engage Congress on climate policies or engages without supporting or opposing climate policy.

RATIONALE:

ExxonMobil did not publicly engage Congress on climate policies during the study period.

SOURCE DATA

ExxonMobil did not publicly engage Congress on climate policies during the study period.

CONSISTENT SUPPORT FOR US FEDERAL POLICY ACTION TO REDUCE CARBON EMISSIONS

SCORE:

Fair (0): Company identifies a general category of climate policy that it supports (e.g., carbon tax) on the company website or in public statements.

RATIONALE:

The company supports a revenue-neutral carbon tax, stating that —a properly designed carbon tax can be predictable, transparent, and comparatively simple to understand and implement” (ExxonMobil Corporation 2016a). The company’s External Citizenship Advisory Panel has called for —more specificity about the company’s support for a carbon tax, as well as its engagement on other policy issues in the United States and internationally” (ExxonMobil Corporation 2016b).

SOURCE DATA

- —Policymakers around the world currently are considering a variety of legislative and regulatory options to achieve these ends. Among the various proposals, **ExxonMobil believes a revenue-neutral carbon tax would be a more effective policy option than cap-and-trade schemes, regulations, mandates, or standards. A properly designed carbon tax can be predictable, transparent, and comparatively simple to understand and implement”** (ExxonMobil Corporation 2016b).
- —Exxon Mobil CEO Rex Tillerson last week said he doesn't intend to ‘fake it’ on climate change... The company said Wednesday that **it supports a carbon tax over a cap-and-trade system**. Exxon Mobil is ‘actively engaged’ with the European companies through an organization called International Petroleum Industry Environmental Conservation Association, or Ipieca, representing more than 60 percent of oil and gas production, spokesman Scott Silvestri said.” (Patel and Blas 2015)

ENGAGEMENT ON THE EPA CLEAN POWER PLAN (EPA-HQ-OAR-2013-0602)

SCORE:

Poor (-1): Company submitted comments opposing the EPA Clean Power Plan and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate; or the company explicitly referenced and endorsed a trade association or industry group's comments that opposed the EPA Clean Power Plan without presenting a specific, viable policy alternative; or the company, through an industry group, participated in a lawsuit against the EPA regarding the Clean Power Plan.

RATIONALE:

ExxonMobil funds the Pacific Legal Foundation, which is a plaintiff in a lawsuit against the Environmental Protection Agency regarding the Clean Power Plan (ExxonMobil Corporation 2016c; State of West Virginia et al. v. EPA 2016; ExxonMobil Corporation 2015).

SOURCE DATA

ExxonMobil funds of the Pacific Legal Foundation (ExxonMobil Corporation 2016c; ExxonMobil Corporation 2015). The Pacific Legal Foundation is a plaintiff in a lawsuit against the EPA (*State of West Virginia et al. v. EPA 2016*).

ENGAGEMENT ON THE EPA METHANE RULE (EPA-HQ-OAR-2010-0505-4776)

SCORE:

Fair (0): Company did not submit comments to the EPA regarding the methane rule.

RATIONALE:

The company did not submit comments to the EPA regarding the methane rule.

SOURCE DATA

The company did not submit comments to the EPA regarding the methane rule.

COMPANY INFLUENCE THROUGH INTERNATIONAL OR NATIONAL BUSINESS ALLIANCES OR INITIATIVES THAT ARE SUPPORTIVE OF SPECIFIC CLIMATE POLICIES

SCORE:

Fair (0): Company has not signed onto any international or national business alliances or initiatives supportive of specific climate policies.

RATIONALE:

The company has not signed on to international or national business alliances or initiatives supportive of specific climate policies.

SOURCE DATA

The company has not signed on to international or national business alliances or initiatives supportive of specific climate policies.

SUPPORTING FAIR AND EFFECTIVE CLIMATE POLICIES SCORE: FAIR (0)

Peabody Energy

CPA-ZICKLIN INDEX OF CORPORATE POLITICAL DISCLOSURE AND ACCOUNTABILITY SCORES

TABLE 9. CPA-Zicklin Index of Corporate Political Disclosure and Accountability Scores

	Raw Score	Description	Rationale
Disclosure	23	Good (+1)	<p>Peabody Energy publicly discloses:</p> <ul style="list-style-type: none"> • Corporate contributions to political candidates, parties, and committees • Payments to 527 groups such as governors associations and super PACS (political action committees) • Independent political expenditures made in direct support of or opposition to a campaign • Payments to trade associations that the recipient organization may use for political purposes • the company's senior managers who have final authority over the company's political spending decisions <p>The company provides partial disclosure or no disclosure of other aspects of political spending (CPA 2015).</p>
Policy	9	Fair (0)	<p>Peabody Energy publicly describes or makes available:</p> <ul style="list-style-type: none"> • Policy stating that all of its contributions will promote the interests of the company and will be made without regard for the private political preferences of executives • Policy requiring senior managers to oversee and have final authority over all of the company's political spending • Policy that the board of directors regularly oversees the company's corporate political activity <p>It has a partial policy or no policy in other areas related to political spending (CPA 2015).</p>

Oversight	10	Fair (0)	<p>ExxonMobil has a specified board committee that:</p> <ul style="list-style-type: none"> • Reviews the company's political expenditures made with corporate funds • Reviews the company's payments to trade associations and other tax-exempt organizations that may be used for political purposes • Oversees its political activity (composed entirely of outside directors) <p>The company makes available a dedicated political disclosure web page found through search or accessible within three mouse-clicks from homepage.</p> <p>It has partial or no oversight in other areas related to political spending (CPA 2015).</p>
-----------	----	----------	---

DATA SOURCES: PEABODY ENERGY CORPORATION 2016B; PEABODY ENERGY CORPORATION 2015A; PEABODY ENERGY CORPORATION 2015B; PEABODY ENERGY CORPORATION 2015C; PEABODY ENERGY CORPORATION 2015D

ENGAGEMENT WITH CONGRESS ON FEDERAL CLIMATE POLICIES OR LEGISLATION

SCORE:

Fair (0): Company does not publicly engage Congress on climate policies or engages without supporting or opposing climate policy.

RATIONALE:

Peabody Energy did not publicly engage Congress on climate policies during the study period.

SOURCE DATA

Peabody Energy did not publicly engage Congress on climate policies during the study period.

CONSISTENT SUPPORT FOR US FEDERAL POLICY ACTION TO REDUCE CARBON EMISSIONS

SCORE:

Egregious (-2): Company opposes US federal or state climate policies without identifying any policy that it supports and has used climate science disinformation as justification for its opposition.

RATIONALE:

Company opposes the Clean Power Plan, stating that “no science supports the relevant causal links” between greenhouse gas levels and changes in climate, and does not identify any policy that it supports.

SOURCE DATA

- —**But no science supports the relevant causal links**—the connection between changes in GHG levels and any changes in climate (much less whether a reduction in emissions will “cause” any environmental impact and the resulting change in human welfare)” (State of West Virginia et al. v. EPA 2016).
- —**Bad Policy That Won't Stand in Court**
 The EPA is essentially “energy profiling” by picking favorites to drive U.S. energy policy, and there are questions concerning whether EPA’s proposed rule, if enacted, will stand in court.
 This policy play has been tried and failed many times. In Australia, a carbon tax drove up energy costs to double that of other nations. Outrage over soaring electricity costs, lost jobs and a soft economy resulted in the worst Labor defeat in eight decades, with recent installation of the new liberal party government.
 Europe's Carbon Emissions Trading System Sent Prices Soaring

In California, where **coal is essentially left out of the energy equation**, electricity prices are among the highest in the nation. Nearly 12 million Californians are eligible for low-income energy assistance.

These are lessons, not models for U.S. energy policy.

California's Energy Policies Significantly Drive Up Power Costs

Beyond the issues with poor policy, there is an important legal question about the agency's actions: The EPA seeks a rule that will mandate carbon capture and storage technology for all new coal plants. While this technology is promising for the future, it is not commercially available, and certainly not able to satisfy the nation's need for low-cost power.

Many believe the agency is acting outside its authority under the Clean Air Act by attempting to rewrite energy policy and force a standard that is impossible to achieve. **Congress never intended the Clean Air Act to be used this way**" (Peabody Energy Corporation 2016a)

ENGAGEMENT ON THE EPA CLEAN POWER PLAN (EPA-HQ-OAR-2013-0602)

SCORE:

Egregious (-2): Company submitted comments opposing the EPA Clean Power Plan and did not present a specific, viable policy alternative that would have equal or greater benefit to the climate and used climate science disinformation as justification for opposition; or explicitly referenced and endorsed the statement of an industry group that used climate science disinformation as justification for opposition; or directly participated in a lawsuit against the EPA regarding the Clean Power Plan.

RATIONALE:

Company claimed that **"a science supports the relevant causal links"** between greenhouse gas levels and changes in climate as part of a lawsuit against the EPA over the Clean Power Plan (State of West Virginia et al. v. EPA 2016).

SOURCE DATA

"But no science supports the relevant causal links"—the connection between changes in GHG levels and any changes in climate (much less whether x reduction in emissions will **"cause"** y environmental impact and the resulting change in human welfare)" (State of West Virginia et al. v. EPA 2016).

ENGAGEMENT ON THE EPA METHANE RULE (EPA-HQ-OAR-2010-0505-4776)

SCORE:

Fair (0): Company did not submit comments to the EPA regarding the methane rule.

RATIONALE:

The company did not submit comments to the EPA regarding the methane rule.

SOURCE DATA

The company did not submit comments to the EPA regarding the methane rule.

COMPANY INFLUENCE THROUGH INTERNATIONAL OR NATIONAL BUSINESS ALLIANCES OR INITIATIVES THAT ARE SUPPORTIVE OF SPECIFIC CLIMATE POLICIES

SCORE:

Fair (0): Company has not signed onto any international or national business alliances or initiatives supportive of specific climate policies.

RATIONALE:

The company has not signed on to international or national business alliances or initiatives supportive of specific climate policies.

SOURCE DATA

The company has not signed on to international or national business alliances or initiatives supportive of specific climate policies.

SUPPORTING FAIR AND EFFECTIVE CLIMATE POLICIES SCORE: POOR (-3)

Royal Dutch Shell

CPA-ZICKLIN INDEX OF CORPORATE POLITICAL DISCLOSURE AND ACCOUNTABILITY SCORES

TABLE 10. CPA-Zicklin Index of Corporate Political Disclosure and Accountability Scores

	Zicklin Score	Description	Rationale
Disclosure	18	Fair (0)	The company's policy is not to make political contributions from corporate funds and not to give to candidates, parties, and committees. The company provides partial disclosure or no disclosure of other aspects of political spending. For example, the company does not disclose payments to trade associations or other tax-exempt organizations such as 501(c)4s that the recipient organization may use for political purposes, and does not disclose a list of the amounts and recipients of payments made by trade associations or other tax-exempt organizations of which the company is either a member or a donor.
Policy	16	Advanced (+2)	The company's policy is not to make political contributions from corporate funds and not to give to candidates, parties, and committees.
Oversight	7	Poor (-1)	The company's policy is not to make political contributions from corporate funds and not to give to candidates, parties, and committees. It has a partial policy or no policy in other areas related to political spending. For example, the company does not have a specified board committee that reviews the company's payments to trade associations and other tax-exempt organizations that may be used for political purposes.

DATA SOURCES: ROYAL DUTCH SHELL 2016B; ROYAL DUTCH SHELL PLC 2006

ENGAGEMENT WITH CONGRESS ON FEDERAL CLIMATE POLICIES OR LEGISLATION

SCORE:

Fair (0): Company does not publicly engage Congress on climate policies or engages without supporting or opposing climate policy.

RATIONALE:

The company did not publicly engage Congress on climate policies during the study period.

SOURCE DATA

The company did not publicly engage Congress on climate policies during the study period.

CONSISTENT SUPPORT FOR US FEDERAL POLICY ACTION TO REDUCE CARBON EMISSIONS**SCORE:**

Fair (0): Company identifies a general category of climate policy that it supports (e.g., carbon tax) on the company website or in public statements.

RATIONALE:

On the company website and in public statements, Shell consistently identifies government-led carbon-pricing mechanisms as a general category of climate policy that it supports (Royal Dutch Shell PLC 2016a).

SOURCE DATA

—~~W~~ believe that, while technological developments will emerge, effective policy and cultural change is essential to drive low-carbon business and consumer choices and opportunities. The transition to low-carbon solutions is best underpinned by **meaningful government-led carbon ‘pricing’ mechanisms**”; “Shell is a long-time supporter of government-led carbon —pricing” mechanisms” [...] **Shell supports the establishment of government-led carbon “pricing” mechanisms that deliver a meaningful cost on CO2 emissions, necessary to create a shift to a lower-carbon power and fuel options.** A carbon —pricing” mechanism is an effective way to stimulate investment in the development of low-carbon technologies and to create new energy choices. Government carbon —pricing” policies are designed to change the cost of goods and services, to favour those that result in lower emissions. Both CO2 taxes and emissions trading systems could generate new revenue for governments and ensure that consumers are not affected by higher energy costs. Ideally this could create a virtuous circle in which emissions fall, while living standards continue to rise.” (Royal Dutch Shell PLC 2016a).

ENGAGEMENT ON THE EPA CLEAN POWER PLAN (EPA-HQ-OAR-2013-0602)**SCORE:**

Fair (0): Company did not submit comments to the EPA regarding the Clean Power Plan.

RATIONALE:

Shell did not submit comments to the EPA regarding the Clean Power Plan.

SOURCE DATA

Shell did not submit comments to the EPA regarding the Clean Power Plan.

ENGAGEMENT ON THE EPA METHANE RULE (EPA-HQ-OAR-2010-0505-4776)**SCORE:**

Fair (0): Company did not submit comments to the EPA regarding the methane rule.

RATIONALE:

Shell did not submit comments to the EPA regarding the methane rule.

SOURCE DATA

Shell did not submit comments to the EPA regarding the methane rule.

COMPANY INFLUENCE THROUGH INTERNATIONAL OR NATIONAL BUSINESS ALLIANCES OR INITIATIVES THAT ARE SUPPORTIVE OF SPECIFIC CLIMATE POLICIES**SCORE:**

Good (+1): Company signed on to business initiatives that demonstrate support for specific climate policies, such as the American Business Act on Climate Pledge, Trillion Ton Communiqué, the Paris Pledge for Action, the Guide for Responsible Corporate Engagement in Climate Policy, or the Oil and Gas Climate Initiative.

RATIONALE:

The company signed the Trillion Ton Communiqué (Corporate Leaders Group 2014) and is a member of the Oil and Gas Climate Initiative (OGCI 2015).

SOURCE DATA

—The members of the Oil and Gas Climate Initiative (OGCI) welcome and support the historic result achieved by 195 nations at the 21st Conference of the Parties (COP21).

In alignment with the Paris Agreement, the OGCI's Joint Declaration issued October 2015 recognized the general ambition to limit global average temperature rise to less than 2°C, and that the current trend of the world's net greenhouse gas (GHG) emissions is not consistent with this ambition. The Paris Agreement, which strives to limit the global average temperature rise to well below 2°C, offers the world a clear signal that will help all actors to take actions and make investments towards a lower carbon future. The OGCI believes that this offers significant opportunity for innovation and investments in lower GHG emission solutions" (OGCI 2015).

SUPPORTING FAIR AND EFFECTIVE CLIMATE POLICIES SCORE: FAIR (+2)

[REFERENCES]

Arch Coal, Inc. 2016. Get the facts. Online at <http://archcoal.com/environment/getthefacts.aspxm>, accessed September 29, 2016.

Arch Coal, Inc. 2014a. Comments in Carbon pollution emission guidelines for existing stationary sources: Electric utility generating units submitted by Deck Slone., on behalf of Arch Coal, Inc. (EPA document EPA-HQ-OAR-2013-0602). Washington, DC: Environmental Protection Agency.

Arch Coal, Inc. 2014b. Comments in Carbon pollution emission guidelines for existing stationary sources: Electric utility generating units submitted by Donald Vickers., on behalf of Arch Coal, Inc. (EPA document EPA-HQ-OAR-2013-0602). Washington, DC: Environmental Protection Agency.

Baker, D.R. 2016. CEO attacks climate rules. *San Francisco Chronicle*, May 26.

BP PLC. 2016a. The climate challenge. Online at www.bp.com/en/global/corporate/sustainability/the-energy-challenge-and-climate-change/the-climate-challenge.html, accessed August 25, 2016.

BP PLC. 2016b. United States Securities and Exchange Commission form 20-F. Online at www.sec.gov/Archives/edgar/data/313807/000119312516492156/d80942d20f.htm, accessed August 24, 2016.

BP PLC. 2015. Comments in NSPS and NESHAP for oil & gas production and gas transmission submitted by Robert L. Stout, Jr., on behalf of BP PLC (EPA document EPA-HQ-OAR-2010-0505). Washington, DC: Environmental Protection Agency.

BP PLC. 2012. Our code: it's what we believe in. Online at www.bp.com/content/dam/bp-country/en_au/products-services/procurement/code-of-conduct.pdf, accessed September 30, 2016.

Center for Political Accountability (CPA). 2015. The 2015 CPA-Zicklin index of corporate political disclosure and accountability: S&P 500 review shows political disclosure enters the corporate mainstream. Online at http://files.politicalaccountability.net/index/CPA-Zicklin_Index_Final_with_links.pdf, accessed August 17, 2016.

Chevron Corporation. 2016. Policy principles for addressing climate change. Online at www.chevron.com/corporate-responsibility/climate-change/policy-principles, accessed August 25, 2016.

Chevron Corporation. 2015. Comments in NSPS and NESHAP for oil & gas production and gas transmission submitted by Maria Pica Karp on behalf of Chevron Corporation (EPA document EPA-HQ-OAR-2010-0505). Washington, DC: Environmental Protection Agency.

ConocoPhillips. 2016. Climate change position. Online at www.conocophillips.com/sustainable-development/our-approach/Documents/Climate%20Change%20Position_FINAL.pdf, accessed September 30, 2016.

ConocoPhillips. 2014. Comments in NSPS and NESHAP for oil & gas production and gas transmission submitted by Jenny C. Yang on behalf of Chevron Corporation (EPA document EPA-HQ-OAR-2010-0505). Washington, DC: Environmental Protection Agency.

CONSOL Energy Inc. 2015. Comments in NSPS and NESHAP for oil & gas production and gas transmission submitted by Steven Buffone on behalf of Consol Energy Corporation (EPA document EPA-HQ-OAR-2010-0505). Washington, DC: Environmental Protection Agency.

CONSOL Energy Inc. 2014. Comments in Carbon pollution emission guidelines for existing stationary sources: Electric utility generating units submitted by Richard Winschel on behalf of Consol Energy Corporation (EPA document EPA-HQ-OAR-2013-0602). Washington, DC: Environmental Protection Agency.

Corporate Leaders Group. 2014. Trillion ton communique. Online at www.corporateleadersgroup.com/resources/publications/publications-pdfs/trillion-tonne-communique-brochure.pdf, accessed August 25, 2016

Dlouhy, J.A. 2015. Oil industry says methane plan unneeded. *Houston Chronicle*, January 14.

ExxonMobil Corporation. 2016a. Engaging on climate. Online at <http://corporate.exxonmobil.com/en/current-issues/climate-policy/climate-perspectives/engagement-to-address-climate-change>, accessed August 24, 2016.

ExxonMobil Corporation. 2016b. External citizenship advisory panel. Online at <http://corporate.exxonmobil.com/en/community/corporate-citizenship-report/about-this-report/citizen-advisory-panel>, accessed August 17, 2016.

ExxonMobil Corporation. 2016c. Worldwide giving report: Public information and policy research. Online at <http://cdn.exxonmobil.com/~media/global/files/worldwide-giving/2015-worldwide-contributions-public-policy.pdf>, accessed August 18, 2016.

ExxonMobil Corporation. 2015. Worldwide giving report: Public information and policy research. Online at <https://web.archive.org/web/20150919072336/http://cdn.exxonmobil.com/~media/global/files/worldwide-giving/2014-worldwide-contributions-public-policy.pdf>, accessed September 6, 2015.

Oil and Gas Climate Initiative (OGCI). 2015. OGCI welcomes the Paris agreement. Online at www.oilandgasclimateinitiative.com/news/ogci-welcomes-the-paris-agreement, accessed August 17, 2016.

Patel, T. and Blas, J. 2015. European oil companies open climate schism with US rivals. *Houston Chronicle*, June 2.

Peabody Energy Corporation. 2016a. Bad policy that won't stand in court. Online at <https://web.archive.org/web/20160729183634/http://www.peabodyenergy.com/content/496/coal-in-the-united-states/bad-policy>, accessed July 29, 2016.

Peabody Energy Corporation. 2016b. Peabody energy corporation nominating and corporate governance committee charter. Online at <https://mscusppegrs01.blob.core.windows.net/mmfiles/files/investors/copr gov/nominating.pdf>, accessed September 30, 2016.

Peabody Energy Corporation. 2015a. Advanced energy: 2014 corporate and social responsibility report. Online at https://mscusppegrs01.blob.core.windows.net/mmfiles/files/corpresponsibility/2014_csrr.pdf, accessed September 30, 2016.

Peabody Energy Corporation. 2015b. Peabody corporate political contributions. Online at <https://mscusppegrs01.blob.core.windows.net/mmfiles/files/corpresponsibility/peabody%20political%20contributions.pdf>, accessed September 30, 2016.

Peabody Energy Corporation. 2015c. Political and lobbying activities. Online at www.peabodyenergy.com/content/506/political-and-lobbying-activities, accessed September 30, 2016.

Peabody Energy Corporation. 2015d. US industry group and trade association annual dues and other payments made in 2014 used for lobbying expenditures and/or political activities. Online at <https://mscuspegrs01.blob.core.windows.net/mmfiles/files/corpresponsibility/industry%20and%20trade.pdf>, accessed September 30, 2016.

Royal Dutch Shell PLC. 2016a. Climate change and energy transitions. Online at www.shell.com/sustainability/environment/climate-change.html, accessed August 25, 2016.

Royal Dutch Shell PLC. 2016b. United States Securities and Exchange Commission form 20-F. Online at www.sec.gov/Archives/edgar/data/1306965/000119312516499117/d943478d20f.htm, accessed August 26, 2016.

Royal Dutch Shell PLC. 2006. Shell code of conduct: How to live by the Shell general business principles. Online at www.shell.com/content/dam/shell/static/public/downloads/corporate-pkg/code-of-conduct-english.pdf, accessed August 26, 2016.

State of West Virginia et al. v. Environmental Protection Agency, et al. 2016. USCA case 15-1363. Initial reply brief of intervenors Dixon Bros., Inc., Nelson Brothers, Inc., Wesco International, Inc., Norfolk Southern Corp., Joy Global Inc., Gulf Coast Lignite Coalition, and Peabody Energy Corp. supporting petitioners. Online at [www.ago.wv.gov/publicresources/epa/Documents/Peabody%20Intervenor%20Brief%20-%20file-stamped%20\(M0119624xCECC6\).pdf](http://www.ago.wv.gov/publicresources/epa/Documents/Peabody%20Intervenor%20Brief%20-%20file-stamped%20(M0119624xCECC6).pdf), accessed September 7, 2016.