



November 12, 2021

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To: Whom It May Concern

RE: FY 2022 - 2026 EPA Strategic Plan Draft - Docket Number EPA-HQ-OA-2021-0403

We appreciate the opportunity to provide input to the Environmental Protection Agency (EPA) 2022 - 2026 Strategic Plan Draft. As described in the Strategic Plan, the EPA aims to renew its commitment to its key principles: follow the science, follow the law, and be transparent. As a data standards setter, our expertise, and thus our recommendations in this letter, focus on the third principle, "be transparent".

I am the CEO of XBRL US, a nonprofit data standards organization. The mission of XBRL US is to improve the efficiency and quality of reporting in the U.S. by promoting the adoption of business reporting standards. Better reporting results in greater transparency and accountability, and improves the ability of government agencies to set useful policies. Better reporting also promotes efficiency improvements that save money for those reporting, collecting, and using data. XBRL US members include public companies, accounting firms, software, data, and service providers, as well as other nonprofits and standards organizations. XBRL US is a jurisdiction of XBRL International¹, the nonprofit consortium responsible for developing and maintaining the technical eXtensible Business Reporting Language (XBRL) specification, which is a free and open data standard widely used around the world for reporting by public and private companies, as well as government entities.

To meet the seven strategic goals laid out in the EPA Strategic Plan requires access to clean, consistent, timely, detailed data to pinpoint problem areas, devise solutions and track the progress of programs.

The EPA collects a vast amount of data about companies and individual facilities owned by those companies. For example, the EPA Greenhouse Gas Reporting Program (GHGRP) requires entities to report detailed information about emissions by unit and fuel type. This complex highly dimensional data is then made available to the public in spreadsheets. We support the EPA's efforts to publish these rich datasets, but we urge the EPA to modernize their data publication so that data is provided in machine-readable format, rather than spreadsheets that require some form of manual extraction process. Unambiguous, machine-readable data can be automatically checked and consumed by data users, has higher data integrity, is self-explanatory, and is significantly more timely.

¹ XBRL International: <https://www.xbrl.org/>

There are global trends towards increasing use of standardization in regulatory data collection because these programs result in greater transparency and accountability, dramatic cost reduction, and improved timeliness and productivity. 80 regulators around the world have adopted data standards, and have established 184 different regulatory data collection programs² that are characterized as financial, capital markets, tax, government, and business registrars. Below are some of the key reasons why now is the time for the EPA to adopt the standardization of the data it collects and provides to the public:

The Federal Energy Regulatory Commission (FERC) has adopted XBRL for financial and energy data reporting.

Starting this year, every public utility is required to report data on Forms 1, 2, 6, 714 and 60 to the Commission in XBRL format. Below are examples from a FERC Form 1, prepared in structured format. Data reported by utilities is both financial and energy related, and some of it may be required to be reported to the EPA as well.

The figure below shows part of the Schedule of Electric Operating Revenues for Pacific Gas & Electric. The value, 80,065,844 by itself is meaningless. But when accompanied by metadata (shown in red bubbles) such as the name of the reporting entity, the name of the concept reported, MEGAWATT HOURS SOLD, Residential Sales account type, data type and units, as well as time period, this number has meaning. Having this level of detail associated with the number renders it unambiguous and fully machine-readable. The structure of XBRL digitally embeds each number reported with the appropriate metadata like this one shown below. When that fact is transported from the XBRL report itself to a database or analytical application, it is immediately understood.

Line No.	Title of Account (a)	Operating Revenues Year to Date Quarterly/Annual (b)	Operating Revenues Previous year (no Quarterly) (c)	MEGAWATT HOURS SOLD Year to Date Quarterly/Annual (d)	MEGAWATT HOURS SOLD Amount Previous year (no Quarterly) (e)	AVG. NO. CUSTOMERS PER MONTH Current Year (no Quarterly) (f)	AVG. NO. CUSTOMERS PER MONTH Previous Year (no Quarterly) (g)
1	Sales of Electricity						
2	(440) Residential Sales	700			80,065,844		15
3	(442) Commercial and Industrial Sales						
4	Small (or Comm.) (See Instr. 4)	700			70		15
5	Large (or Ind.) (See Instr. 4)	12,843,421.215			70		15
6	(444) Public Street and Highway Lighting	700			70		15

The second example below, from the same Form 1 filing, illustrates the metadata that must be associated with the number 10, in order for it to be meaningful. This number represents PG&E's S02 Allowances Inventory, issued by the EPA for 2020, in US dollars. The metadata depicted in red bubbles shows the characteristics of the number that must be embedded in it to fully understand its meaning. XBRL formatting provides this level of detail to enable machine-readability.

² XBRL International Project Directory: <https://www.xbrl.org/the-standard/why/xbrl-project-directory/>

Line No.	SO2 Allowances Inventory (Account 158.1) (a)	Current Year		Year One	
		No. (b)	Amt. (c)	No. (d)	Amt. (e)
1	Balance-Beginning of Year	10	10	10	10
2			Units = US dollars	SO2 Allowances Inventory	
3	Acquired During Year:		Pacific Gas & Electric	Data type = monetary	
4	Issued (Less Withheld Allow)	10	10	10	10
5	Returned by EPA	10	2020	Returned by EPA	10

Climate related data is likely to be required to be reported to the SEC in structured (XBRL) format.

The Securities and Exchange Commission (SEC) has been developing a rule proposal that will call for climate-related disclosures for public companies, and it is expected that the proposal will require structured data standards for the data disclosed. In her comments during a speech³ last Fall, SEC Commissioner Allison Herren Lee noted, “Another area that could benefit from structured data [XBRL] to support usability and comparability is in the area of climate change and other ESG risks and impacts... developing standardized climate and ESG disclosure requirements should be a top priority for the Commission. As we consider this, we should also consider how to make the data disclosed under such requirements as usable as possible, including through tagging [XBRL] requirements.”

The most likely structured data standard to be used to support climate disclosures to the SEC is XBRL, for these reasons:

- 6,000 public companies and investment management companies, today report using the XBRL standard for financial statements and footnote data, and have been doing so since 2009.
- The Value Reporting Foundation built an XBRL taxonomy⁴ that was published in September 2021 that contains standards to assist public companies to report Environmental-Social-Governance data including items such as Greenhouse Gas Emissions, and other water and pollution metrics, similar to the data types collected by the EPA today.
- Global reporting entities who follow IFRS will be using ESG standards based on the Value Reporting Foundation XBRL Taxonomy. The IFRS Foundation, this month announced⁵ the formation of the International Sustainability Standards Board (ISSB) which is tasked with developing a comprehensive global base of sustainability disclosure standards to meet investor needs for ESG-related data. They also announced the consolidation of the

³ The Promise of Structured Data: <https://www.sec.gov/news/speech/lee-structured-data-2020-11-17>

⁴ Structured Reporting Using XBRL - SASB Digital Reporting Strategy: <https://www.sasb.org/structured-reporting-xbrl/>

⁵ IFRS Foundation announcement: <https://www.valuereportingfoundation.org/news/ifrs-foundation-announcement/>

Climate Disclosure Standards Board (CDSB) and the Value Reporting Foundation, by June 2022.

The figure below shows a portion of the Value Reporting Foundation Taxonomy, specifically the section related to volume of air emissions. Reporting entities using this taxonomy, can report Volume of Air Emissions categorized as Carbon Dioxide (CO), Lead (Pb), Manganese (Mno), etc., simply by associating a fact with the concept “Air Emissions, Volume” and one of the Pollutant categories in the red box above.

Given that these standards are available and likely to be used by U.S. companies reporting to the SEC, it would be appropriate for the EPA to adopt these standards as well.

[-] Air Emissions Disclosure [Abstract]	String
Air Emissions Disclosure [Text Block]	TextBlock
[-] EM-IS-120a.1 [Abstract]	String
[-] Air Emissions, Volume [Table]	Table
[-] Pollutant [Axis]	Axis
[-] Pollutant [Domain]	Domain
Carbon Monoxide (CO) [Member]	Domain
Lead (Pb) [Member]	Domain
Manganese (Mno) [Member]	Domain
Nitrogen Oxide (NO), Excluding Nitrogen Oxygen [Member]	Domain
Particulate Matter (PM) [Member]	Domain
Polycyclic Aromatic Hydrocarbons (Pahs) [Member]	Domain
Sulfur Monoxide (SO) [Member]	Domain
Volatile Organic Compounds (Vocs) [Member]	Domain
[-] Air Emissions, Volume [Line Items]	String
Air Emissions, Volume	Mass

The SEC rule proposal on climate disclosures is expected to be published late this year or early 2022. Given the need for many U.S. companies to report ESG-related disclosures to multiple markets around the world, it is likely that most regulators will adopt standards developed by the ISSB although there will likely be some regional differences.

Data reported to the EPA would be effectively supported by XBRL.

XBRL is not a product. It is an open, nonproprietary (free) data standard, and is designed to accommodate many data types, from monetary to energy to volume to mass. The standard is in widespread use, therefore many entities reporting to the EPA today are already reporting in XBRL, and there are many open source and commercial tools on the market available to prepare, collect, and extract and analyze XBRL data.

Adoption of XBRL relies on a single data model that is documented in a machine-readable taxonomy. The reliance on a single data model means that regulators can easily manage changes in reporting requirements. A change in reporting requirements is implemented once to the

taxonomy. That change is then automatically communicated to the reporting entities, the data collection system, and to the applications used to extract and use the data.

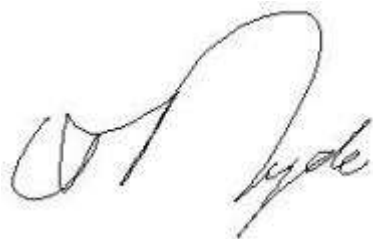
Successful regulatory standards programs provide critical benefits to federal agencies, reporting entities, and users of the data they collect:

- Production of machine-readable, high-quality, consistent data that can be automatically consumed, and is available to use as soon as it is reported.
- The ability to commingle multiple data sets. Data from different sources, but with the same underlying structure, can be commingled easily for richer, more decision-useful analysis.
- Reduced cost for creators, collectors, and users of data.
- Reduced burden on data creators. Report data once, multiple consumers can access what they want, when they want it.

In the U.S. alone, 6,000 public companies, 5,000 banks, and 600 public utilities report in XBRL to their respective regulatory agencies. We urge the EPA to consider adding the adoption of standards to their strategic plan. Not only will an effective data standards program help in meeting the goal of “be transparent”, it will also assist in reducing costs and burden, and improving the value and timeliness of information reported.

Please feel free to contact us if you have any follow up questions or would like to discuss. I can be reached by emailing campbell.pryde@xbrl.us or at (917) 582-6159.

Respectfully,

A handwritten signature in black ink, appearing to read 'Campbell Pryde', is positioned above the typed name.

Campbell Pryde,
President and CEO