* **Timing:** In many multifamily properties, residents hold their own utility accounts, and utilities provide whole building data as a batch dataset. It often takes up to 6 months, or longer, to obtain prior year whole building data from utilities. It is recommended that the submission period for SB 253 allows for ample time to collect and synthesize this data.
* **Timing:** Many companies already report both the emissions data and climate-related financial impacts required by both SB 253 and 261. These disclosures usually capture prior year data (ex. 2024 data released in report published in 2025). It is recommended that the state allows for the submission of previously prepared reports (ex. submitting a company's 2025 report in 2026, which would cover 2024 data) to lessen the burden of additional data collection and reporting cycles.
* **Assurance:** The scope of "limited assurance" varies greatly across providers. It is recommended that the state adopts a standard expectation or scope of work definition for limited assurance.
* **Assurance:** Many companies affected by SB 253 will be going through the assurance process for the first time. It is recommended that the timeline for reasonable assurance be delayed to allow these companies to acclimate to the assurance process and align necessary resources.
* **Scope 3 Emissions:** Most companies report scope 3 emissions according to what they have determined to be material to their business. It is recommended that companies be allowed to define materiality affecting required scope 3 emissions under SB 253.
* **Climate Risk Disclosure:** Forecasts for financial impacts of climate risks are estimates with broad ranges that can convey little useful information. It is recommended that the scope of SB 261 be focused on the communication of types of climate risk that affect a company, and the level of exposure a company has to these risks. It should not be required for companies to disclose broad estimates of dollar amounts.