

# Tricks of the Trade

*How companies anonymously influence climate policy through their business and trade associations*

[www.ucsusa.org/tricksofthetrade](http://www.ucsusa.org/tricksofthetrade)

Appendix: Research Methods

© January 2014

All rights reserved

## Introduction

To assess companies' disclosure about involvement with their trade associations' climate-related political activities, the Union of Concerned Scientists (UCS) analyzed voluntary disclosure data solicited and compiled by CDP—an international not-for-profit organization. CDP administers an annual climate-reporting questionnaire sent to more than 5,000 companies worldwide at the request of 722 institutional investors representing \$87 trillion in invested capital (CDP 2013a). In addition, companies also voluntarily report to CDP, even if their participation has not been specifically requested.

The 2013 questionnaire asked companies about their climate-related political activity, including trade group membership and whether they agreed with their groups' climate policy positions (CDP 2013b). To help companies confirm what those policy positions were, the UCS produced a report, *Assessing Trade and Business Groups' Positions on Climate Change*, that documented the climate policy positions of 14 major U.S. trade groups (UCS 2013). The report was featured in CDP's questionnaire guidance document for responding companies (CDP 2013c).

## About this Document

In this document we detail the data analyzed and methods used in the *Tricks of the Trade* report, including: specific questions from the CDP questionnaire (Figure 1); criteria for disclosure; procedures for determining board membership of the four trade associations assessed; and results of trade association disclosure. The full boards of directors of the four trade associations are listed in Tables 1 to 4; Table 5 lists companies that disclosed board membership or funding beyond membership of any of these associations but that were not captured in our board-member analysis. Charts depicting the responses of all board-member companies for each trade association can be found in Figures 2 to 5.

## Methodology

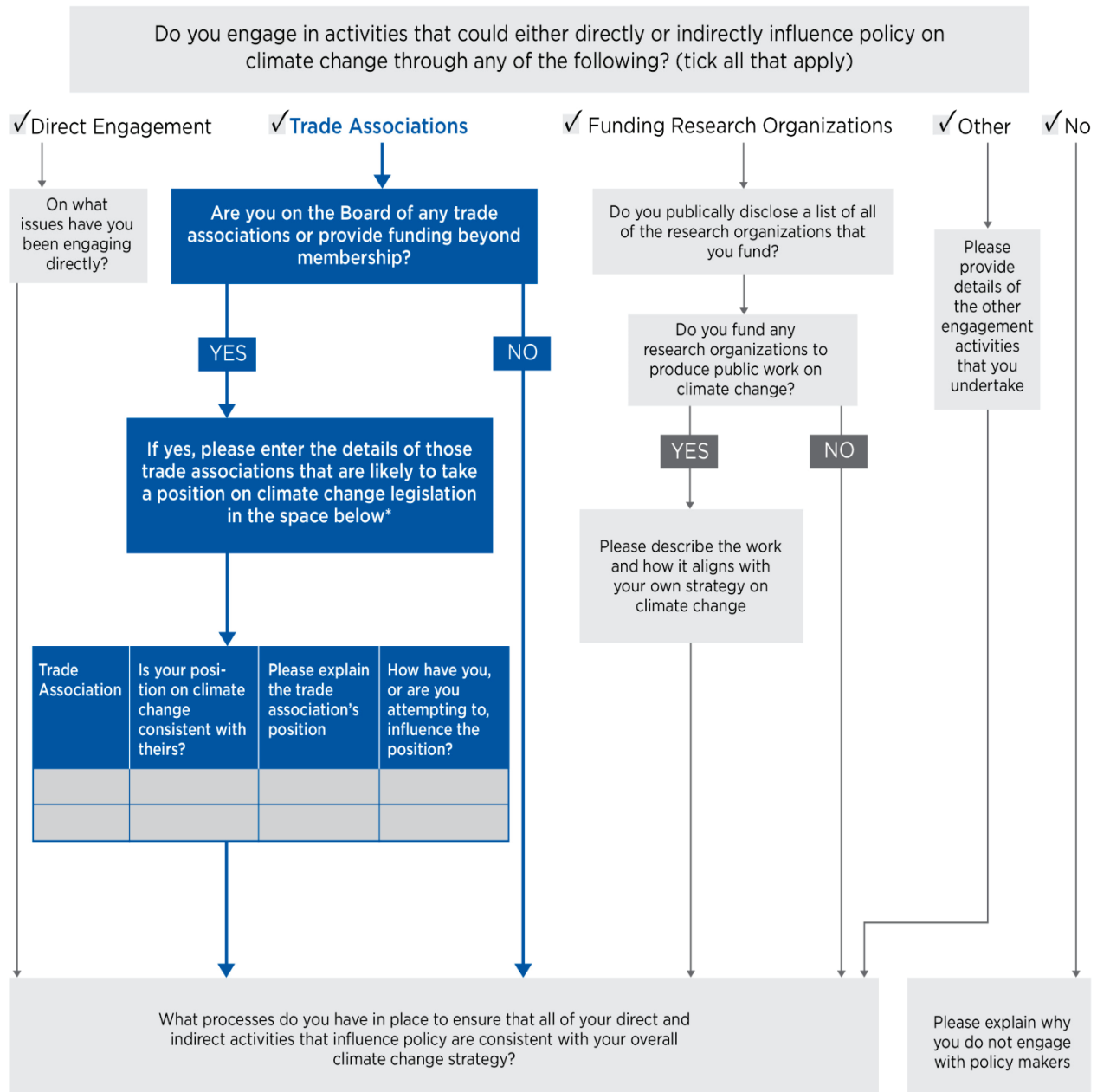
We obtained from CDP the data it received from companies in response to its 2013 climate-reporting questionnaire. These data are available on the CDP website at [www.cdp.net/en-US/Results/Pages/overview.aspx](http://www.cdp.net/en-US/Results/Pages/overview.aspx). We analyzed the answers of the 1,824 companies that publicly responded to the questionnaire's section 2.3 ("Engagement with Policy Makers") to learn what companies disclosed about their affiliations with trade and business associations (Figure 1).

## Company Disclosure Responsibilities

Companies not providing information about their board memberships and related political activity in the appropriate field (2.3c) were marked as not disclosing if their trade group board memberships were omitted there. Because responsible corporate disclosure should be clear and easily accessible, leaving the question field blank or not directly answering the questions—for example, by providing additional information elsewhere, supplying an annual report, or listing the address of an external website—was not considered disclosure.

Parent companies responding to CDP were held accountable for the political activity of large subsidiaries; thus they were subsequently marked as not disclosing if their subsidiaries' board memberships were omitted.

**FIGURE # 1. CDP Climate Reporting Questionnaire: Questions on Corporate Political Influence**



*In 2013, the annual climate reporting questionnaire administered by CDP asked companies to report their influence on climate policy. If companies reported policy influence through trade associations and stated that they sat on the board of any trade associations or provided funding beyond membership, they were then asked if their position on climate change was consistent with those of their trade groups and how they have attempted to influence their groups' positions. The text here is presented exactly as it appeared in the CDP questionnaire.*

\*The CDP questionnaire guidance document for companies linked to the UCS report *Assessing Trade and Business Groups' Positions on Climate Change* as a resource for companies to determine their associations' climate science and policy positions.

## Trade Association Board Memberships

Company responses were compared with the publicly available board membership lists of the National Association of Manufacturers (NAM), the U.S. Chamber of Commerce (COC), the American Petroleum Institute (API), and the Edison Electric Institute (EEI)—four groups that have been heavily engaged in climate policy debates both at the federal and state levels (UCS 2013).

Board member companies of the four trade associations were identified as follows:

- The NAM board membership list analyzed was that reported on the NAM website on September 20, 2013 (NAM 2013).
- The COC board membership list analyzed was that reported on the COC website October 1, 2013 (COC 2013).
- The API does not publicly list its board membership on its website. The API board membership list analyzed in this report is that identified on the API's 2011 Tax Form 990 (API 2011). Tax forms were used to identify board members who were matched with the company they represented at the time of the tax form filing.
- The EEI does not publicly list its board membership on its website. The EEI board membership list analyzed is that identified on the EEI's 2011 Tax Form 990 (EEI 2011). Tax forms were used to identify board members who were matched with the company they represented at the time of the tax form filing.

Disclosure data from individual companies on the boards of the NAM, COC, API, and EEI are listed in Tables 1, 2, 3, and 4, respectively.

Groups represented on the boards of these trade associations that are not companies—e.g., other associations—are listed in the tables but were not counted as a board company for any of the statistics in this analysis.

A limitation to these methods is the possibility of discrepancies in any given trade association's board of directors over time. The board-member lists that applied when companies responded to the CDP questionnaire, and those we obtained through other means, may have had slight differences due to ongoing board membership changes or outdated board lists. To mitigate this issue, we examined all companies that either stated they were on the board of any of these four groups or that provided funding to them beyond membership, regardless of whether the company appeared on our obtained board lists (Table 5). Given that very few companies disclosed board membership or funding beyond membership that were not on our board lists, the disclosure rates reported in this analysis would still stand, even if the time of the questionnaire and time of board lists are, in fact, misaligned.

## Detailed Results

Using this methodology, disclosure of trade group board membership was tallied as follows:

- NAM: Among the 73 of the 206 NAM board-member companies that publicly responded to the CDP questionnaire, only one in five acknowledged its NAM board seat. Thirty-one companies on the NAM board did not respond to CDP's request, and eight responded privately—i.e., they disclosed only to CDP and its shareholders (Figure 2).
- COC: Only one of the 32 companies on the COC's board that publicly responded to the questionnaire acknowledged its board seat, even though 44 of the COC's 117 board-member companies were asked to complete the questionnaire (Figure 3).
- API: Eight of the 17 API board companies that publicly responded to the questionnaire acknowledged their API board seats, even though CDP requested information from 26 of the API's 40-company board (Figure 4).
- EEI: Among the 54 of the 71 companies on the EEI's board of directors that were asked to complete the questionnaire, 26 companies responded publicly and only 15 of them acknowledged their board memberships (Figure 5).

## Board-Member Company Response Tables

TABLE 1. NAM Board-Member Companies' Responses

	NAM Board-Member Company	Invited to fill out the CDP questionnaire	Publicly responded to the CDP questionnaire	Listed the NAM in Question 2.3c	Is your position on climate change consistent with the NAM's?
1	Cummins Inc.	Yes	Yes	Yes	Unknown
2	Eli Lilly and Company	Yes	Yes	Yes	Unknown
3	Air Products and Chemicals, Inc.	Yes	Yes	Yes	Mixed
4	DTE Energy Company	Yes	Yes	Yes	Mixed
5	Ford Motor Company	Yes	Yes	Yes	Mixed
6	Halliburton	Yes	Yes	Yes	Mixed
7	Johnson Controls, Inc.	Yes	Yes	Yes	Mixed
8	WESCO International, Inc.	Yes	Yes	Yes	Mixed
9	General Electric	Yes	Yes	Yes	Inconsistent
10	The Clorox Company	Yes	Yes	Yes	Inconsistent
11	Waste Management	Yes	Yes	Yes	Inconsistent
12	Ball Corporation	Yes	Yes	Yes	Consistent
13	MeadWestvaco Corporation	Yes	Yes	Yes	Consistent
14	Merck & Co., Inc.	Yes	Yes	Yes	Consistent
15	PPG Industries, Inc.	Yes	Yes	Yes	Consistent
16	3M Company	Yes	Yes	No	
17	AbbVie	Yes	Yes	No	
18	Accenture	Yes	Yes	No	
19	Alcoa Inc.	Yes	Yes	No	
20	Altria Corporate Services, Inc.	Yes	Yes	No	
21	American Air Liquide Holdings, Inc.	Yes	Yes	No	
22	American Electric Power	Yes	Yes	No	
23	Anadarko Petroleum Corporation	Yes	Yes	No	
24	ArcelorMittal USA	Yes	Yes	No	
25	Ashland Inc.	Yes	Yes	No	
26	AT&T	Yes	Yes	No	
27	Baker Hughes Incorporated	Yes	Yes	No	
28	BASF Corporation	Yes	Yes	No	
29	Bayer Corporation	Yes	Yes	No	
30	BP America, Inc.	Yes	Yes	No	

	NAM Board-Member Company	Invited to fill out the CDP questionnaire	Publicly responded to the CDP questionnaire	Listed the NAM in Question 2.3c	Is your position on climate change consistent with the NAM's?
31	Bristol-Myers Squibb Company	Yes	Yes	No	
32	Brown-Forman Corporation	Yes	Yes	No	
33	Cargill, Incorporated	Yes	Yes	No	
34	ConAgra Foods	Yes	Yes	No	
35	CSX Corporation	Yes	Yes	No	
36	Deloitte & Touche LLP	Yes	Yes	No	
37	Devon Energy Corporation	Yes	Yes	No	
38	Eastman Chemical Company	Yes	Yes	No	
39	Emerson Electric	Yes	Yes	No	
40	Ernst & Young	Yes	Yes	No	
41	Exxon Mobil Corporation	Yes	Yes	No	
42	General Motors Company	Yes	Yes	No	
43	Grant Thornton LLP	Yes	Yes	No	
44	Honda North America, Inc.	Yes	Yes	No	
45	Ingersoll Rand Company	Yes	Yes	No	
46	Intel Corporation	Yes	Yes	No	
47	John Crane Group Corporation - a division of Smiths Group PLC	Yes	Yes	No	
48	Lanxess Corporation	Yes	Yes	No	
49	Lockheed Martin Corporation	Yes	Yes	No	
50	Masco Corporation	Yes	Yes	No	
51	Microsoft Corporation	Yes	Yes	No	
52	Norfolk Southern Corporation	Yes	Yes	No	
53	Owens-Illinois, Inc.	Yes	Yes	No	
54	Pernod Ricard USA	Yes	Yes	No	
55	Pfizer Inc.	Yes	Yes	No	
56	Rockwell Automation	Yes	Yes	No	
57	S.C. Johnson & Son, Inc.	Yes	Yes	No	
58	Saint-Gobain Corporation	Yes	Yes	No	
59	Sanofi US	Yes	Yes	No	
60	SAP America, Inc.	Yes	Yes	No	
61	Shell Oil Company	Yes	Yes	No	
62	Smithfield Foods, Inc.	Yes	Yes	No	
63	Stanley Black & Decker, Inc.	Yes	Yes	No	
64	Teradata Corporation	Yes	Yes	No	
65	Textron Inc.	Yes	Yes	No	
66	The Boeing Company	Yes	Yes	No	

	NAM Board-Member Company	Invited to fill out the CDP questionnaire	Publicly responded to the CDP questionnaire	Listed the NAM in Question 2.3c	Is your position on climate change consistent with the NAM's?
67	The Procter & Gamble Company	Yes	Yes	No	
68	The Sherwin-Williams Company	Yes	Yes	No	
69	Union Pacific Corporation	Yes	Yes	No	
70	United States Steel Corporation	Yes	Yes	No	
71	UnitedHealth Group Incorporated	Yes	Yes	No	
72	Verizon Communications Inc.	Yes	Yes	No	
73	Whirlpool Corporation	Yes	Yes	No	
74	AGCO Corporation	Yes	No		
75	Allegheny Technologies Incorporated	Yes	No		
76	Archer Daniels Midland Company	Yes	No		
77	Armstrong World Industries, Inc.	Yes	No		
78	Beam Inc.	Yes	No		
79	C.R. Bard Inc.	Yes	No		
80	Cameron International Corporation	Yes	No		
81	Caterpillar Inc.	Yes	No		
82	CF Industries Holdings, Inc.	Yes	No		
83	Con-way Inc.	Yes	No		
84	Crown Holdings, Inc.	Yes	No		
85	Donaldson Company, Inc.	Yes	No		
86	Energizer Holdings, Inc.	Yes	No		
87	Faurecia USA Holdings, Inc.	Yes	No		
88	Fresenius Medical Care	Yes	No		
89	Harley-Davidson, Inc.	Yes	No		
90	Harsco Corporation	Yes	No		
91	Kennametal Inc.	Yes	No		
92	Leggett & Platt Incorporated	Yes	No		
93	Lincoln Electric Holdings Inc.	Yes	No		
94	Marathon Oil Corporation	Yes	No		
95	Marathon Petroleum Corporation	Yes	No		
96	Nucor Corporation	Yes	No		
97	Peabody Energy Corporation	Yes	No		
98	Phillips 66	Yes	No		
99	PricewaterhouseCoopers LLP	Yes	No		
100	Rayonier	Yes	No		
101	SKF USA Inc.	Yes	No		
102	Snap-on Incorporated	Yes	No		

	NAM Board-Member Company	Invited to fill out the CDP questionnaire	Publicly responded to the CDP questionnaire	Listed the NAM in Question 2.3c	Is your position on climate change consistent with the NAM's?
103	Southern Company	Yes	No		
104	SUMCO Phoenix Corporation	Yes	No		
105	The Babcock & Wilcox Company	Yes	No		
106	The Manitowoc Company, Inc.	Yes	No		
107	The Timken Company	Yes	No		
108	Trinity Industries, Inc.	Yes	No		
109	Valmont Industries, Inc.	Yes	No		
110	Volvo Group North America	Yes	No		
111	Vulcan Materials Company	Yes	No		
112	W. R. Grace & Co.	Yes	No		
113	A. O. Smith Corporation	No			
114	ACE Clearwater Enterprises	No			
115	Acuity Brands, Inc.	No			
116	AFIMAC	No			
117	AGCO-Amity JV, LLC	No			
118	Al-jon Mfg, LLC	No			
119	ALOM Technologies Corporation	No			
120	Altec, Inc.	No			
121	Apogee Enterprises, Inc.	No			
122	Arch Coal, Inc.	No			
123	Ariel Corporation	No			
124	Arizona Public Service Company	No			
125	Atlas Machine and Supply, Inc.	No			
126	Behlen Mfg. Co.	No			
127	Bishop-Wisecarver Corporation	No			
128	Bison Gear & Engineering Corporation	No			
129	BKD, LLP	No			
130	BNSF Railway Company	No			
131	Bommer Industries, Inc.	No			
132	Brady Corporation	No			
133	Brunswick Corporation	No			
134	BTE Technologies, Inc.	No			
135	CA BOTANA International, Inc.	No			
136	Calgon Carbon Corporation	No			
137	Carolina Color Corporation	No			
138	Carter Products Company, Inc.	No			
139	Case New Holland Inc.	No			



	<b>NAM Board-Member Company</b>	<b>Invited to fill out the CDP questionnaire</b>	<b>Publicly responded to the CDP questionnaire</b>	<b>Listed the NAM in Question 2.3c</b>	<b>Is your position on climate change consistent with the NAM's?</b>
140	Centennial Bolt, Inc.	No			
141	Click Bond, Inc.	No			
142	Control Technology, Inc	No			
143	Daktronics, Inc.	No			
144	Dana Holding Corporation	No			
145	Davis Boat Works, Inc	No			
146	Diamond Casting & Machine Co. Inc.	No			
147	Donovan Heat Treating Company, Inc.	No			
148	E & E Manufacturing Co., Inc.	No			
149	EFCO Corp.	No			
150	Ellwood Group, Inc.	No			
151	Emergent BioSolutions, Inc.	No			
152	Energy Future Holdings Corp.	No			
153	Fisher Barton, Inc.	No			
154	General & Automotive Machine Shop, Inc.	No			
155	Glier's Meats, Inc.	No			
156	Globe Manufacturing Company, LLC	No			
157	Hannay Reels, Inc.	No			
158	Hialeah Metal Spinning, Inc.	No			
159	Hillenbrand, Inc.	No			
160	Hoerbiger Compression Technology Holding	No			
161	Hyster-Yale Materials Handling, Inc.	No			
162	Irex Corporation	No			
163	JBT Corporation	No			
164	JELD-WEN, Inc.	No			
165	Kanawha Manufacturing Co.	No			
166	Kelly-Moore Paint Company, Inc.	No			
167	Kent Corporation	No			
168	Koch Companies Public Sector, LLC	No			
169	KPMG LLP	No			
170	Longview Fibre Paper and Packaging, Inc.	No			
171	LORD Corporation	No			
172	Marlin Steel Wire Products LLC	No			
173	Materion Technical Materials	No			
174	McGladrey LLP	No			
175	McLanahan Corporation	No			
176	Metal Essence, Inc.	No			

	<b>NAM Board-Member Company</b>	<b>Invited to fill out the CDP questionnaire</b>	<b>Publicly responded to the CDP questionnaire</b>	<b>Listed the NAM in Question 2.3c</b>	<b>Is your position on climate change consistent with the NAM's?</b>
177	Modine Manufacturing Company	No			
178	Neenah Enterprises, Inc.	No			
179	New England Wire Technologies	No			
180	NewPage Corporation	No			
181	Oldcastle Building Products, Inc.	No			
182	Paulson Manufacturing Corporation	No			
183	Pella Corporation	No			
184	Penske Corporation	No			
185	Phoenix Closures, Inc.	No			
186	Pine Hall Brick Co., Inc.	No			
187	Porta-King Building Systems	No			
188	Power Curbers, Inc.	No			
189	PTC	No			
190	Quality Float Works, Inc.	No			
191	Reinke Manufacturing Company, Inc.	No			
192	Rush-Co	No			
193	SAS Institute Inc.	No			
194	Sealaska Corporation	No			
195	Subaru of Indiana Automotive, Inc.	No			
196	Task Force Tips, Inc.	No			
197	Tenneco Inc.	No			
198	The Belden Brick Company	No			
199	The L. S. Starrett Company	No			
200	The Schwan Food Company	No			
201	The Strainrite Companies	No			
202	Vermeer Corporation	No			
203	Westinghouse Electric Company	No			
204	Williams-Pyro, Inc.	No			
205	Windham Millwork, Inc.	No			
206	YRC Worldwide Inc.	No			
207	American Cleaning Institute*	No			
208	American Forest & Paper Association*	No			
209	Connecticut Business & Industry Assn, Inc.*	No			
210	Council of Industry of Southeastern NY*	No			
211	Minnesota Chamber of Commerce*	No			
212	Mississippi Manufacturers Association*	No			

	<b>NAM Board-Member Company</b>	<b>Invited to fill out the CDP questionnaire</b>	<b>Publicly responded to the CDP questionnaire</b>	<b>Listed the NAM in Question 2.3c</b>	<b>Is your position on climate change consistent with the NAM's?</b>
213	Northeast PA Manufacturers & Employers Association*	No			
214	Society of Chemical Manufacturers & Affiliates*	No			

\*Non-company board member

SOURCES: CDP 2013D; NAM 2013

---

TABLE 2. COC Board-Member Companies' Responses

	COC Board-Member Company	Invited to fill out the CDP questionnaire	Publicly responded to the CDP questionnaire	Listed the COC in Question 2.3c	Is your position on climate change consistent with the COC's?
1	United Parcel Service	Yes	Yes	Yes	Mixed
2	3M	Yes	Yes	No	
3	Accenture	Yes	Yes	No	
4	AEGON N.V.	Yes	Yes	No	
5	Alcoa, Inc.	Yes	Yes	No	
6	Allianz of America, Inc.	Yes	Yes	No	
7	Allstate Insurance Company	Yes	Yes	No	
8	Altria Client Services	Yes	Yes	No	
9	Amadeus North America	Yes	Yes	No	
10	AT&T	Yes	Yes	No	
11	CONSOL Energy, Inc.	Yes	Yes	No	
12	Deloitte LLP	Yes	Yes	No	
13	DHL Americas	Yes	Yes	No	
14	Duke Energy Corp.	Yes	Yes	No	
15	Emerson Electric	Yes	Yes	No	
16	FedEx Express	Yes	Yes	No	
17	Fluor Corporation	Yes	Yes	No	
18	IBM	Yes	Yes	No	
19	Las Vegas Sands Corporation	Yes	Yes	No	
20	Navistar, Inc.	Yes	Yes	No	
21	Norfolk Southern Corporation	Yes	Yes	No	
22	PEPCO Holdings Inc.	Yes	Yes	No	
23	Pfizer, Inc.	Yes	Yes	No	
24	Rolls-Royce North America, Inc.	Yes	Yes	No	
25	Sanofi US Services Inc.	Yes	Yes	No	
26	Siemens Corporation	Yes	Yes	No	
27	TAPFIN, a ManpowerGroup Company	Yes	Yes	No	
28	The Dow Chemical Company	Yes	Yes	No	
29	The Travelers Companies, Inc.	Yes	Yes	No	
30	Verizon Communications Inc.	Yes	Yes	No	
31	WellPoint, Inc.	Yes	Yes	No	
32	Xerox Corporation	Yes	Yes	No	
33	AECOM	Yes	No		
34	AGCO Corporation	Yes	No		
35	Black Hills Corporation	Yes	No		
36	Caesars Entertainment Corporation	Yes	No		
37	Caterpillar Inc.	Yes	No		
38	CNH	Yes	No		
39	Phillips 66 Company	Yes	No		

	<b>COC Board-Member Company</b>	<b>Invited to fill out the CDP questionnaire</b>	<b>Publicly responded to the CDP questionnaire</b>	<b>Listed the COC in Question 2.3c</b>	<b>Is your position on climate change consistent with the COC's?</b>
40	Silgan Holdings Inc.	Yes	No		
41	Southern Company	Yes	No		
42	The Charles Schwab Corporation	Yes	No		
43	US Airways - Retired	Yes	No		
44	Vulcan Materials Company	Yes	No		
45	Action Chemical, Inc.	No			
46	Alliance Resource Partners, L.P.	No			
47	Alpha Technologies, Inc.	No			
48	Amway	No			
49	Argo Group International Holdings Ltd	No			
50	ASRC Construction Holding Company	No			
51	Associates International, Inc.	No			
52	BNSF Railway Company	No			
53	Buffalo Supply, Inc.	No			
54	Citadel LLC	No			
55	Clark Robinson Capital	No			
56	Comanche Lumber Co., Inc.	No			
57	Constangy, Brooks & Smith, LLP	No			
58	CUNA Mutual Group Insurance & Financial Services	No			
59	DDB Worldwide Communications Group, Inc.	No			
60	DonahueFavret Contractors Holding Company	No			
61	DryStone Capital LLC	No			
62	E&E Enterprises Global, Inc.	No			
63	Edward Jones	No			
64	Emergent Biosolutions Inc.	No			
65	FACES Day Spa	No			
66	Front Street Advisors, Ltd.	No			
67	Gnosis Management Group, LLC	No			
68	Granite Construction, Inc.	No			
69	Great Western Lodging	No			
70	Health Care Service Corporation	No			
71	Herglotz Public Affairs Strategies, Inc.	No			
72	High Companies	No			
73	Hutchison Advisors	No			
74	Indiana University Health	No			
75	International Merchants, LLC	No			
76	J.R.'s Goodtimes, Inc.	No			
77	Jackson Kelly, PLLC	No			
78	Kirkland & Ellis LLP	No			
79	Lafert, LLC	No			
80	Leading Authorities, Inc.	No			
81	LORD Corporation	No			

	<b>COC Board-Member Company</b>	<b>Invited to fill out the CDP questionnaire</b>	<b>Publicly responded to the CDP questionnaire</b>	<b>Listed the COC in Question 2.3c</b>	<b>Is your position on climate change consistent with the COC's?</b>
82	LTM Enterprises	No			
83	Ludlum Measurements, Inc	No			
84	Melaleuca, Inc.	No			
85	Mesa Capital Partners, LLC	No			
86	MI Industries	No			
87	Mountain Plains Equity Group, Inc.	No			
88	NCI Building Systems, Inc.	No			
89	New York Life Insurance Company	No			
90	Odney	No			
91	Oldcastle, Inc.	No			
92	OneAmerica Financial Partners, Inc.	No			
93	Paper and Chemical Supply Company	No			
94	PERMAC Industries	No			
95	PGI	No			
96	Pool Corporation	No			
97	Quam-Nichols Company, Inc.	No			
98	RCAssociates	No			
99	RPM International Inc.	No			
100	Ruan Transportation Management Systems	No			
101	Schneider National, Inc.	No			
102	Schnitzer Steel Industries, Inc.	No			
103	Select Milk Producers, Inc.	No			
104	Spencer Stuart	No			
105	State Farm Mutual	No			
106	Sunrise Senior Living, Inc.	No			
107	Tandy Leather Factory, Inc.	No			
108	Telcom Ventures, L.L.C.	No			
109	The Bay Cast Companies	No			
110	The Carlyle Group	No			
111	The H.L. Turner Group Inc.	No			
112	The Laclede Group	No			
113	UniGroup (Parent of United Van Lines/Mayflower Transit)	No			
114	VAST Solutions, LLC	No			
115	Wegmans Food Markets, Inc.	No			
116	Weinberg Capital Group	No			
117	World Pac Paper, LLC	No			
118	Aircraft Owners and Pilots Association*				
119	American Beverage Association*				
120	Automobile Club of Southern California*				
121	Kentucky Chamber of Commerce*				
122	Michigan Chamber of Commerce*				
123	National Black Chamber of Commerce*				
124	Salt Lake Chamber*				

	<b>COC Board-Member Company</b>	<b>Invited to fill out the CDP questionnaire</b>	<b>Publicly responded to the CDP questionnaire</b>	<b>Listed the COC in Question 2.3c</b>	<b>Is your position on climate change consistent with the COC's?</b>
125	The Latino Coalition*				
126	The Robertson Foundation*				
127	U.S. Chamber of Commerce*				

\*Non-company board member

SOURCES: CDP 2013D; COC 2013

TABLE 3. API Board-Member Companies' Responses

	API Board-Member Company	Invited to fill out the CDP questionnaire	Publicly responded to the CDP questionnaire	Listed the API in Question 2.3c	Is your position on climate change consistent with the API's?
1	Shell Oil Company	Yes	Yes	Yes	Mixed
2	Enbridge, Inc.	Yes	Yes	Yes	Inconsistent
3	Anadarko Petroleum	Yes	Yes	Yes	Consistent
4	Chevron Corporation	Yes	Yes	Yes	Consistent
5	ConocoPhillips	Yes	Yes	Yes	Consistent
6	Devon Energy Corporation	Yes	Yes	Yes	Consistent
7	Halliburton Energy Service	Yes	Yes	Yes	Consistent
8	Occidental Petroleum Corporation	Yes	Yes	Yes	Consistent
9	Baker Hughes Incorporated	Yes	Yes	No	
10	BP America Inc	Yes	Yes	No	
11	Exxon Mobil Corporation	Yes	Yes	No	
12	Fluor Corporation	Yes	Yes	No	
13	Hess	Yes	Yes	No	
14	Rowan Cos	Yes	Yes	No	
15	Schlumberger Limited	Yes	Yes	No	
16	TOTAL E & P USA , Inc.	Yes	Yes	No	
17	U.S. Steel Corporation	Yes	Yes	No	
18	Cameron International	Yes	No		
19	Cobalt International Energy, Inc.	Yes	No		
20	Ensco International	Yes	No		
21	FMC Technologies	Yes	No		
22	Marathon Oil	Yes	No		
23	Marathon Petroleum	Yes	No		
24	Noble Corporation	Yes	No		
25	Teekay Offshore GP L.L.C.	Yes	No		
26	Williams Cos (WMB)	Yes	No		
27	Aaramco	No			
28	Ariel Corporation	No			
29	Bretagne LLC,	No			
30	Colonial Pipeline Company	No			
31	Drill Leader LLC & Cow Run Energy LLC	No			
32	Hunt Consolidated, Inc.	No			
33	Justiss Oil Company	No			
34	Natural Resource Partners	No			
35	Newpark Resources, Inc.	No			
36	Overseas Shipholding Group Inc	No			
37	Parker Drilling	No			
38	Petro-Hunt, L.L.C.	No			
39	Plains GP Holdings LP	No			
40	True Oil LLC	No			

SOURCES: CDP 2013D; API 2011



TABLE 4. EEI Board-Member Companies' Responses

	EEI Board-Member Company	Invited to fill out the CDP questionnaire	Publicly responded to the CDP questionnaire	Listed the EEI in Question 2.3c	Is your position on climate change consistent with the EEI's?
1	Exelon Corporation	Yes	Yes	Yes	Unknown
2	NiSource Inc	Yes	Yes	Yes	Unknown
3	Northeast Utilities	Yes	Yes	Yes	Unknown
4	AES	Yes	Yes	Yes	Mixed
5	CMS Energy	Yes	Yes	Yes	Mixed
6	Consolidated Edison Inc.	Yes	Yes	Yes	Mixed
7	Entergy	Yes	Yes	Yes	Mixed
8	OG&E Energy Corporation	Yes	Yes	Yes	Mixed
9	Pacific Gas and Electric Company (PG&E )	Yes	Yes	Yes	Mixed
10	Pepco Holdings, Inc.	Yes	Yes	Yes	Mixed
11	Xcel Energy	Yes	Yes	Yes	Mixed
12	American Electric Power	Yes	Yes	Yes	Consistent
13	DTE Energy	Yes	Yes	Yes	Consistent
14	Duke Energy	Yes	Yes	Yes	Consistent
15	Integrus Energy Group, Inc.	Yes	Yes	Yes	Consistent
16	Alliant Energy Corporation of RMT Inc.	Yes	Yes	No	
17	Ameren	Yes	Yes	No	
18	CenterPoint Energy	Yes	Yes	No	
19	Emera Inc.	Yes	Yes	No	
20	GenOn Energy Inc. <sup>1</sup>	Yes	Yes	No	
21	Hawaiian Electric Industries Inc.	Yes	Yes	No	
22	Iberdrola USA Inc.	Yes	Yes	No	
23	IDACORP, Inc	Yes	Yes	No	
24	National Grid Gas Holdings plc	Yes	Yes	No	
25	Pinnaacle West	Yes	Yes	No	
26	Wisconsin Energy Corporation,	Yes	Yes	No	
27	ALLETE, Inc.	Yes	No		
28	Avista Corp.	Yes	No		
29	Black Hills Corp.	Yes	No		
30	CH ENERGY GROUP INC (Central Hudson)	Yes	No		
31	Cleco Corporation	Yes	No		
32	Dominion Resources	Yes	No		
33	Edison International	Yes	No		
34	El Paso Electric Co.	Yes	No		
35	Empire District Electric Co.	Yes	No		
36	FirstEnergy	Yes	No		
37	Great Plains Energy Incorporated	Yes	No		
38	ITCTransmission	Yes	No		
39	MDU Resources Group Inc.	Yes	No		

	EEI Board-Member Company	Invited to fill out the CDP questionnaire	Publicly responded to the CDP questionnaire	Listed the EEI in Question 2.3c	Is your position on climate change consistent with the EEI's?
40	MGE Energy, Inc.	Yes	No		
41	NextEra Energy	Yes	No		
42	NorthWestern Energy	Yes	No		
43	NV Energy	Yes	No		
44	Otter Tail Corporation	Yes	No		
45	PNM Resources Inc.	Yes	No		
46	Portland General Electric Company	Yes	No		
47	PPL Corporation	Yes	No		
48	Public Service Enterprise Group Incorporated	Yes	No		
49	Southern Company	Yes	No		
50	TECO Energy Inc	Yes	No		
51	UGI	Yes	No		
52	UIL Holdings Corporation	Yes	No		
53	Vectren Corp	Yes	No		
54	Westar Energy, Inc.	Yes	No		
55	ALASKA ELECTRIC LIGHT & POWER	No			
56	American Transmission Co.	No			
57	Central Vermont Public Service Corporation	No			
58	DPL Inc.	No			
59	Duquesne Light Company	No			
60	Electric Energy Inc.,	No			
61	Energy Future Holdings Corp.	No			
62	Green Mountain Power	No			
63	MidAmerican Energy Holdings Company	No			
64	Mt. Carmel Public Utility Co.	No			
65	NSTAR Electric Company	No			
66	Puget Sound Energy, Inc.	No			
67	Southwest Generation Operating Company, LLC	No			
68	Unitil Corporation	No			
69	UNS Energy	No			
70	VELCO (Vermont Electric Power Company)	No			
71	Wolf Creek Nuclear Operating Corporation	No			
72	Constellation Energy Group <sup>2</sup>	N/A (Yes)			
73	Allegheny Energy <sup>3</sup>	N/A (No)			
74	Progress Energy <sup>4</sup>	N/A (No)			

<sup>1</sup>Merged with NRG Energy, Inc. in December 2012.

<sup>2</sup>Merged with Exelon in March 2012.

<sup>3</sup>Merged with FirstEnergy in 2011.

<sup>4</sup>Became a subsidiary of Duke Energy in July 2012.

SOURCES: CDP 2013D; EEI 2011

**TABLE 5. Companies identifying board membership or funding beyond membership in the NAM, COC, API, or EEI but not listed on board lists analyzed**

<b>Company Name</b>	<b>Trade Association</b>	<b>Is your position on climate change consistent with theirs?</b>
ConocoPhillips	NAM	Consistent
Ecolab Inc.	NAM	Consistent
Marsh & McLennan Companies, Inc.	NAM	Consistent
The Coca-Cola Company	NAM	Inconsistent
American Electric Power Company, Inc.	COC	Consistent
Cummins Inc.	COC	Unknown
The Coca-Cola Company	COC	Inconsistent
Apache Corporation	API	Consistent
General Electric	API	Unknown
Statoil ASA	API	Mixed

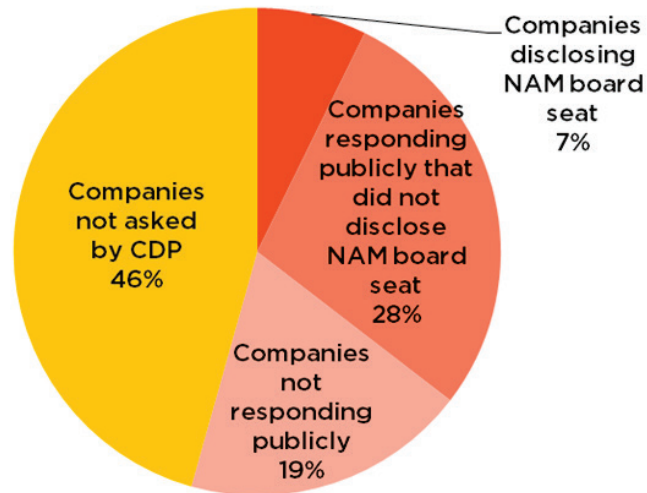
SOURCE: CDP 2013D

## Board Company Disclosure Graphs

---

FIGURE 2. NAM Board Companies' Disclosure

---



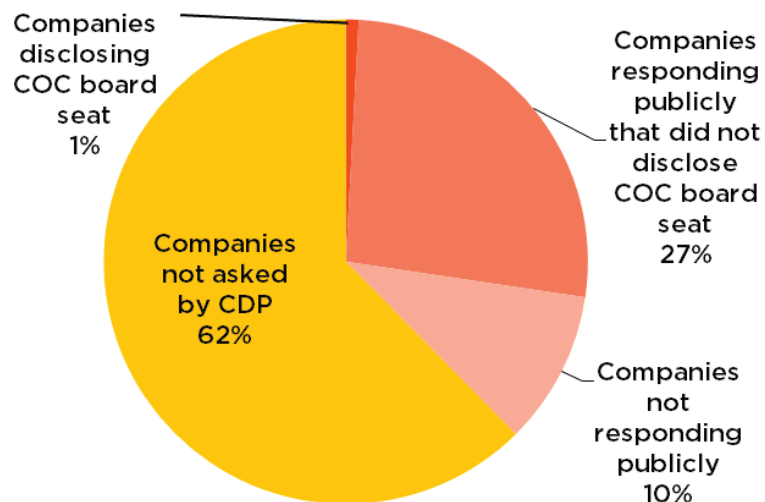
CDP requested information from 112 of the NAM's 206 board-member companies, but only 13 percent of them acknowledged their board seats. A majority of the publicly responding companies did not disclose their NAM board membership.

SOURCE: CDP 2013D

---

FIGURE 3. COC Board Companies' Disclosure

---



Of the 32 companies that publicly responded to the CDP questionnaire, only a single company, UPS, disclosed its board seat. CDP requested information from 44 of the 117 COC board-member companies, the vast majority of which completed the questionnaire but failed to indicate their presence on the board.

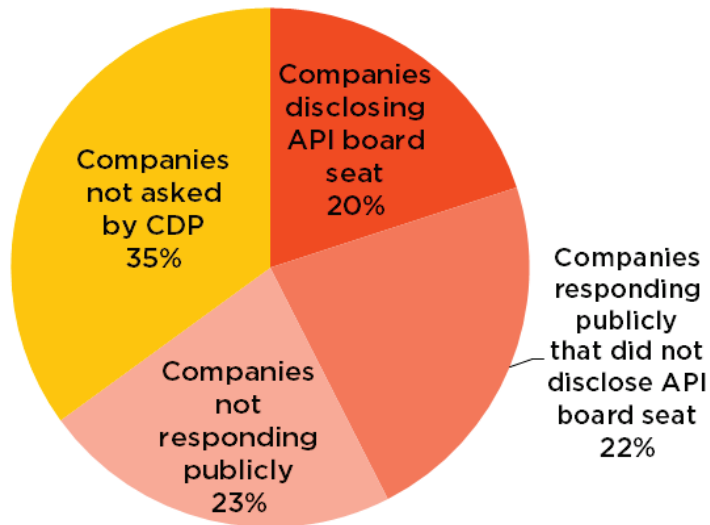
SOURCE: CDP 2013D

---

---

**FIGURE 4. API Board Companies' Disclosure**

---



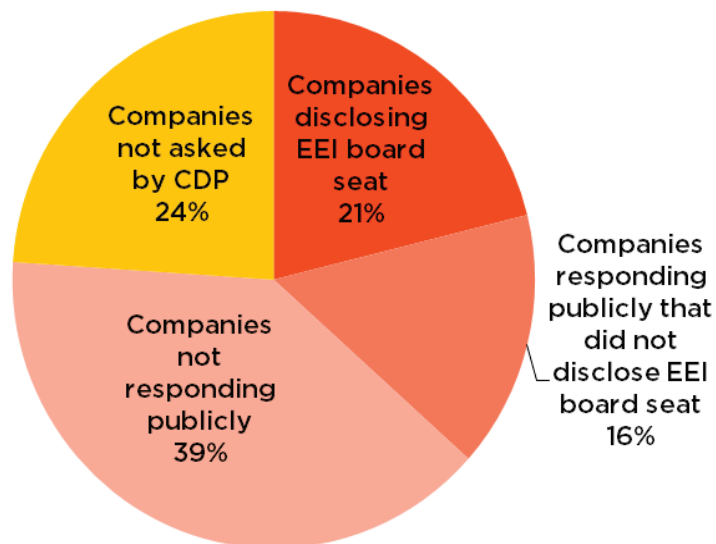
*CDP requested information from 26 of the 40 companies on the API's board. Two-thirds of them responded publicly, but fewer than half of those responding companies acknowledged their board seats.*

SOURCE: CDP 2013D

---

**FIGURE 5. EEI Board Companies' Disclosure**

---



*Of the 54 companies on the EEI's 71-member board that were asked to complete the CDP questionnaire, more than half did not respond. Only 15 of the 26 responding companies acknowledged their board seats.*

SOURCE: CDP 2013D

---

## [REFERENCES]

American Petroleum Institute (API). 2011. Internal Revenue Service Form 990. Online at [http://990s.foundationcenter.org/990\\_pdf\\_archive/130/130433430/130433430\\_201112\\_990O.pdf](http://990s.foundationcenter.org/990_pdf_archive/130/130433430/130433430_201112_990O.pdf), accessed on December 3, 2013.

CDP. 2013a. About us. London, UK. Online at <http://www.cdp.net/en-US/Pages/About-Us.aspx>, accessed on November 24, 2013.

CDP. 2013b. Investor CDP 2013 information request. London, UK. Online at <http://www.cdproject.net/CDP%20Questionnaire%20Documents/Investor-CDP-2013-Information-Request.pdf>, accessed on November 24, 2013.

CDP. 2013c. Guidance for companies reporting on climate change on behalf of investors & supply chain members. 2013. London, UK. Online at <http://www.cdproject.net/Documents/Guidance/CDP2013ReportingGuidance.pdf>, accessed on November 24, 2013.

CDP. 2013d. Reports & Data. 2013. London, UK. Online at <https://www.cdp.net/en-US/Results/Pages/overview.aspx>, accessed on December 20, 2013.

Edison Electric Institute (EEI). 2011. Internal Revenue Service Form 990. Online at [http://990s.foundationcenter.org/990\\_pdf\\_archive/130/130659550/130659550\\_201112\\_990O.pdf](http://990s.foundationcenter.org/990_pdf_archive/130/130659550/130659550_201112_990O.pdf), accessed on December 3, 2013.

National Association of Manufacturers (NAM). 2013. Board of directors. Washington, DC. Online at <http://www.nam.org/About-Us/Board-of-Directors/Landing-Page.aspx>, accessed on December 3, 2013.

Union of Concerned Scientists (UCS). 2013. Assessing trade and business groups' positions on climate change. Cambridge, MA. Online at <http://www.ucsusa.org/tradegroups>, accessed on November 24, 2013.

Union of Concerned Scientists (UCS). 2012. A climate of corporate control: How corporations have influenced the U.S. dialogue on climate science and policy. Cambridge, MA. Online at <http://www.ucsusa.org/corporateclimate>, accessed on November 24, 2013.

U.S. Chamber of Commerce (COC). 2013. Board of directors. Washington, DC. Online at <http://www.uschamber.com/about/board>, accessed on December 3, 2013.