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Utilities on ‘Preliminary’ List of Entities Subject to California Climate Disclosure Rules

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Troutman Pepper Locke’s Shawn Zovod, Melissa Horne, Jason Langford, Tim Carstedt, and Liz Glusman’s article, “[CARB Releases List of Entities Potentially Subject to Climate Disclosure Requirements](#),” was quoted in the September 29, 2025 *Utility Dive* article, “[Utilities on ‘Preliminary’ List of Entities Subject to California Climate Disclosure Rules](#).”

While the list was intended to provide clarity, it is “generating surprise and confusion among the regulated (and non-regulated) community, some of whom expected to find themselves on the list, and others who did not,” according to [a memo from the law firm Troutman Pepper Locke](#). In a followup email to Utility Dive, attorneys at the firm said “until such time as CARB proposes regulations, utilities are in the same boat as the rest of the potentially regulated community and are waiting to see what requirements CARB will mandate.”

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