



PUBLIC DISCLOSURE STATEMENT

AGL TELECOMMUNICATIONS & SOUTHERN
PHONE COMPANY

PRODUCT CERTIFICATION
TELECOMMUNICATIONS
CY2023

Australian Government
**Climate Active
Public Disclosure Statement**



An Australian Government Initiative



NAME OF CERTIFIED ENTITY	AGL ENERGY LIMITED
REPORTING PERIOD	1 January 2023- 31 December 2023 (Arrears)
DECLARATION	<p><i>To the best of my knowledge, the information provided in this public disclosure statement is true and correct and meets the requirements of the Climate Active Carbon Neutral Standard.</i></p> <p><i>tarl hart</i></p> <hr/> <p>Tarl Hart General Manager, Product and Portfolio Date 21/11/2024</p> <p><i>Note: you can submit this document to Climate Active unsigned. The Climate Active team will invite you to sign this document once they have completed their review.</i></p>



Australian Government
**Department of Climate Change, Energy,
the Environment and Water**

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Version: January 2024

1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	29,831.38 tCO ₂ -e
CARBON OFFSETS USED	5% ACCUs, 95% VERs
RENEWABLE ELECTRICITY	NA
CARBON ACCOUNT	Prepared by: Environmental Resources Management (ERM)
TECHNICAL ASSESSMENT	31/03/2021 James Endean, Pangolin Associates Next technical assessment due: CY2024

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2.CERTIFICATION INFORMATION

Description of product certification

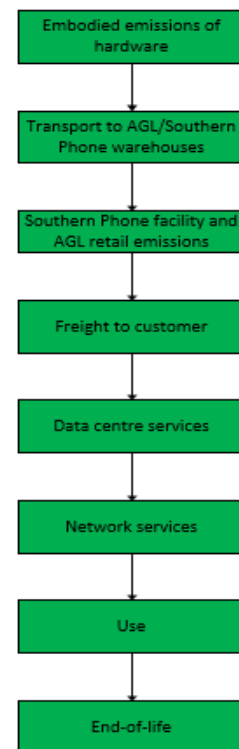
This public disclosure statement supports the carbon neutral product certification for the entirety of telecommunications services sold by AGL Telecommunications and Southern Phone Company. This includes the lifecycle assessment and quantification of Scope 1, 2 and 3 emissions. The emissions reported here are for CY2023, which is the third year of certification. In June 2021, AGL Telecommunications and Southern Phone Company launched a certified Carbon Neutral Telecommunications product to all residential and small business customers of AGL Telecommunications and Southern Phone Company, with no opt-in or customer eligibility requirements.

Scope

- Functional unit: kgCO₂-e/'service in operation' (SIO) per year is used as a quantifiable reference to the associated greenhouse gas emissions of a Telecommunications product. Service in operation refers to an active Telecommunications product and includes the emissions of any associated hardware sold by AGL Telecommunications and Southern Phone Company with that Telecommunications product. For example, one customer with a mobile plan, an **nbn@** plan and a home phone plan would equate to three services in operation. The emissions associated with the hardware that form part of these services is accounted for at the point of sale and covers the full product lifecycle. The emissions associated with the operation and maintenance of the network for these services is accounted for over the lifetime of the plan with AGL Telecommunications and Southern Phone Company. The SIO was calculated based on actual fluctuations throughout the year and reported as an annual average.
- Offered as: full coverage product
- Life cycle: cradle-to-grave

The responsible entity for this product certification is AGL Energy Limited, ABN 74115061375

This Public Disclosure Statement includes information for CY2023 reporting period.



Process map for Telecommunications Product

Organisation description

AGL is a leading integrated essential service provider, with a proud history of innovation. AGL is committed to providing our customers simple, fair and accessible essential services as they decarbonise and electrify the way they live, move and work. We deliver around 4.3 million customer services across energy and telecommunications to our residential, small and large business, and wholesale customers across Australia. We operate the largest electricity generation portfolio in Australia, with an operated generation capacity of 8,735 MW (as at 30 June 2023)¹. AGL's operated generation accounted for approximately 20% of the total generation within the National Electricity Market in FY23. AGL operates the largest renewable and storage portfolio of any ASX-listed company, as at 30 June 2023.

AGL includes related bodies, such as: Data and telecommunications provider Southern Phone Company Limited, which trades as AGL Telecommunications and as Southern Phone Company and sells telecommunications products under both brands.

- Southern Phone Company is one of the largest providers of fixed line, mobile and Internet communications services in regional Australia. Formed in 2002 with a vision to provide regional communities with affordable telecommunications services, Southern Phone Company now serves a national customer base, and operates out of its metropolitan and regional offices.
- AGL Telecommunications launched its first telecommunications products, offering internet services, in November 2020. This was followed by its launch of mobile SIM plans in February 2021.
- New energy providers - AGL Energy Services Pty Ltd sells energy solutions to residential customers based in Queensland, New South Wales, Victoria and South Australia, including solar and battery bundles and battery storage solutions. Sustainable Business Energy Solutions Pty Ltd (trading as AGL Energy Solutions) sells energy solutions to business customers including solar, battery storage, stand-alone power systems, energy efficient lighting and Power Factor Correction. It operates in all Australian states and territories and offers an end-to-end design, project management and installation service for all energy solutions sold.
- Energy retailers – AGL Sales Pty Limited; AGL South Australia Pty Limited; AGL Retail Energy Limited (“AGL energy retail entities”) and Perth Energy Pty Ltd.
 - AGL energy retail entities provide gas and electricity services to residential and business customers across New South Wales, Victoria, South Australia, Queensland and Western Australia. Offering a range of energy plans to suit varying preferences, customers can sign up to our products and services via our digital channels (AGL website, AGL app, My Account) or by calling the AGL contact center.
 - AGL | Perth Energy supplies contestable gas and electricity business customers connected to the Western Power and ATCO gas networks in Western Australia including regional areas such as Albany, Geraldton and Kalgoorlie for electricity, and Geraldton for gas.
 - The accelerating pace of the climate transition, along with the shaping forces of customers, the community and technology, has led to significant changes to the landscape in which AGL operates.

¹ Capacity as at 30 June 2023. <https://www.agl.com.au/content/dam/digital/agl/documents/about-agl/investors/2023/230810-agl-energy-limited-annual-report-2023-4-4-asx.pdf>

3. EMISSIONS BOUNDARY

Inside the emissions boundary

All emission sources listed in the emissions boundary are part of the carbon neutral claim.

Quantified emissions have been assessed as 'attributable processes' of a product or service. These attributable processes are services, materials and energy flows that become the product or service, make the product or service and carry the product or service through its life cycle. These attributable emissions have been quantified in the carbon inventory.

Non-quantified emissions have been assessed as attributable and are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. All material emissions are accounted for through an uplift factor. Further detail is available at Appendix C.

Outside the emissions boundary

Non-attributable emissions have been assessed as not attributable to a product or service. They can be **optionally included** in the emissions boundary and therefore have been offset, or they can be listed as outside of the emissions boundary (and are therefore not part of the carbon neutral claim). Further detail is available at Appendix D.

Inside emissions boundary

Quantified Product

Embodied Emissions of mobile, modem, SIM card, cables and packaging

Freight of imported hardware to AGL/Southern Phone

Transport to customer/store

SPC electricity, fuel, waste and water

Mobile, Internet/VOIP network

Data storage

Product electricity use

End of Life

Quantified Retail

Electricity incl. base building

Professional services

ICT services and equipment

Cleaning and chemicals

Office supplies and services

Postage, courier and logistics

Travel expenses

Machinery and vehicles

Construction materials and construction

Transport (air)

Transport (land and sea)

Accommodation

Food & beverage

Waste

Water

Employee commute

Working from home

Non-quantified

N/A

Optionally included

N/A

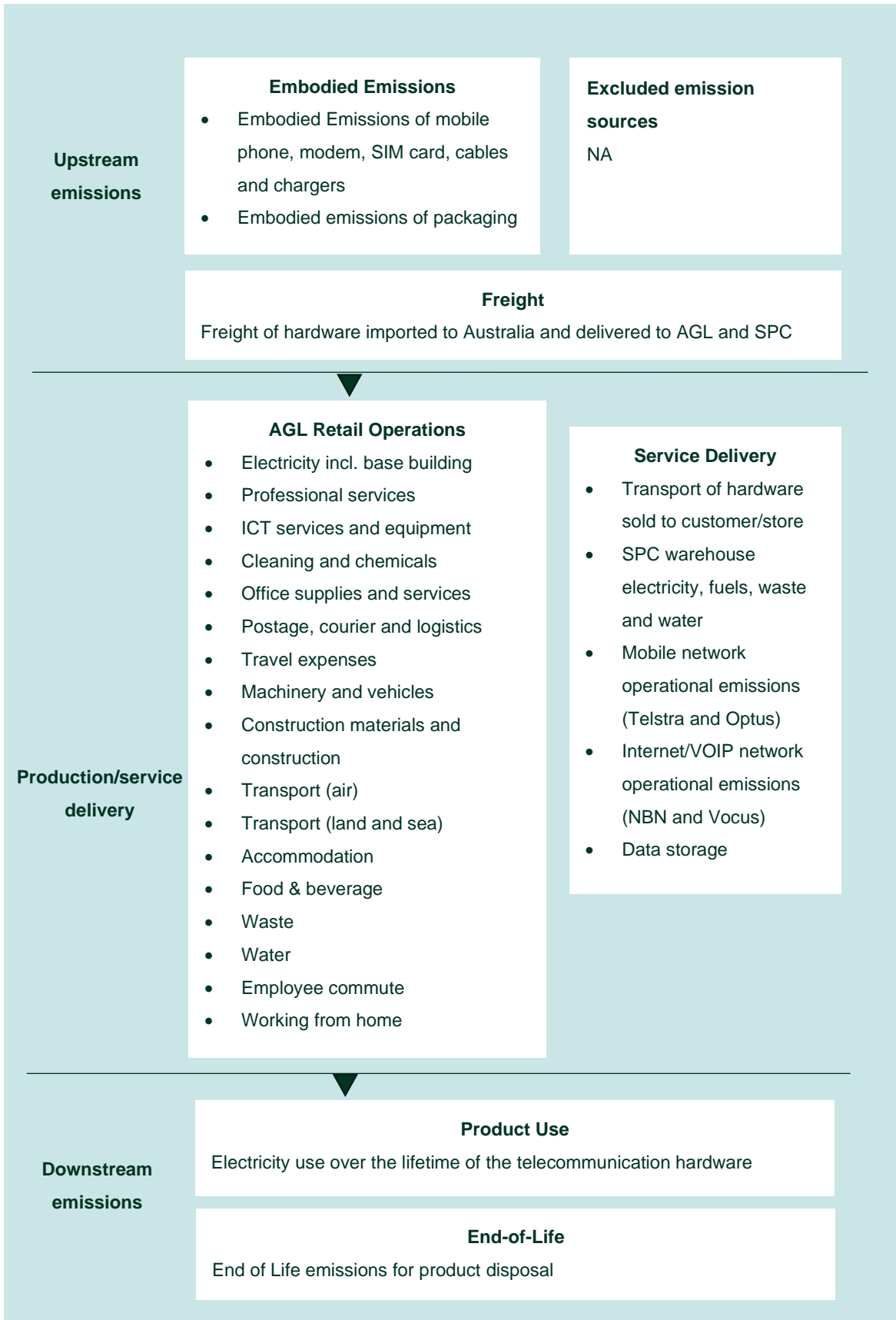
Outside emission boundary

Non-attributable

NA

Service process diagram

The following diagram is cradle to grave.



4. EMISSIONS REDUCTIONS

Emissions reduction strategy

AGL has a strong track record of delivering action on climate change and the energy transition and provide a range of products and services to help our customers decarbonise their businesses and homes.

We have committed, through our Climate Transition Action Plan (**CTAP**), to achieve the following:

- Close Loy Yang A Power Station by the end of FY35². This targeted exit from coal-fired generation, up to a decade earlier than previously announced, would avoid up to 200 MtCO₂-e of greenhouse gases being emitted compared to the previously planned Loy Yang A Power Station closure date.³
- Reduce our annual greenhouse gas emissions by at least 17% compared to a FY19 baseline, from FY24 following the closure of Liddell Power Station in April 2023.^{4,5}
- Reduce our annual greenhouse gas emissions by at least 52% compared to a FY19 baseline, by FY35 following the closure of the Bayswater Power Station by 2033.^{5,6}
- Be Net Zero for operated Scope 1 and 2 greenhouse gas emissions following the closure of all AGL's coal-fired power stations.
- Develop a decarbonisation pathway to achieve our ambition of being Net Zero for Scope 3 greenhouse gas emissions by 2050.
- Seek to supply our customer demand with ~12 GW of additional renewable and firming capacity, requiring a total investment of up to \$20 billion before 2036.⁶ Our initial target is to have up to 5 GW of new renewables and firming capacity in place by 2030, funded from a combination of assets on our balance sheet, offtakes and via partnerships.

Our plan recognises that a balance needs to be struck between responsible transition and rapid decarbonisation, to keep Australia's electricity supply secure, reliable and affordable. We are committed to working constructively with our stakeholders, including government, our people and the communities in which we operate, to lead a responsible and orderly transition.

Furthermore, AGL requires its suppliers to comply with AGL's Supplier Code of Conduct which includes an obligation to minimise environmental footprint and promoting environmental responsibility. Suppliers with

² The ability for AGL to execute on this target will be subject to uncertainties and risks, as described on page 12 of AGL's Climate Transition Action Plan.

³ Maximum emissions avoidance estimated based on maximum annual output from Loy Yang A Power Station over the FY36 - FY46 period.

⁴ Operated Scope 1 and 2 greenhouse gas emissions, as reported under the National Greenhouse and Energy Reporting Act 2007, against a FY19 baseline.

⁵ FY24 and FY35 represent the first full financial years where no emissions from Liddell and Bayswater power stations occur following the closure of these power stations in April 2023 (FY23) and CY33 (FY34) respectively.

⁶ Based on capital cost estimates from AEMO Inputs, Assumptions and Scenarios Workbook, June 2022, adjusted for AGL views where considered appropriate.

strong green credentials are sought out in AGL's tender processes for low carbon intensive hardware, packaging and operations for AGL Telecommunications and Southern Phone Company.

Our Internet plans provide customers with the ability to reduce their footprint through the Climate Active certification and through other initiatives, such as AGL Telecommunications and Southern Phone Company providing customers with the option to provide their own internet modem instead of acquiring a modem from us. We introduced biodegradable satchel packs in 2020. This packaging is made from Bagasse (100% sugarcane waste), and it is completely compostable, produces lower energy-related emissions and is highly durable.

Emissions reduction actions

AGL's operational emissions reduction actions primarily relate to the closure of our coal-fired power stations as outlined in our CTAP released in September 2022.

In April 2023 AGL's Liddell Power Station ceased generation. Decommissioning commenced in FY23. Additionally, as stated in our 2022 CTAP, AGL will develop a decarbonisation pathway to achieve our ambition of being Net Zero for Scope 3 greenhouse gas emissions by 2050.

5. EMISSIONS SUMMARY

Emissions over time

Emissions since base year			
		Total tCO ₂ -e	Emissions intensity of the functional unit
Base year/Year 1:	CY2021	15,262.03	136.45
Year 2:	CY2022	27,667.91	113.26
Year 3:	CY2023	29,831.38	100.37

Significant changes in emissions

Significant changes in emissions			
Attributable process	Previous year emissions (t CO ₂ -e)	Current year emissions (t CO ₂ -e)	Reason for change
Network emissions	14,426.20	10,168.09	Change in NBN's reported scope 1 and 2 emissions in their FY23 sustainability report.
Product use	11,548.37	16,438.56	Increase in functional unit (SIO) covered in this year's inventory

Use of Climate Active carbon neutral products, services, buildings or precincts

N/A

Emissions summary

Telecommunications is a full coverage carbon neutral product. The below summary represents the entire product/service.

Life cycle stage / Attributable process / Emission source	tCO ₂ -e
Embodied emissions products and packaging	2,007.99
Freight (land and sea)	8.25
Network emissions	10,168.09
Data storage	78.02
Southern Phone (energy, fuel, waste and water)	405.30
AGL retail emissions	720.76
Product use	16,438.56
End of life	4.39
Attributable emissions (tCO₂-e)	29,831.38

Product offset liability	
Emissions intensity per functional unit (kgCO ₂ -e/SIO)	100.37
Emissions intensity per functional unit including uplift factors	N/A
Number of functional units covered by the certification (SIO)	297,224
Total emissions (tCO₂-e) to be offset	29,831.38

6. CARBON OFFSETS

Eligible offsets retirement summary

Offsets retired for Climate Active certification

Type of offset units	Eligible quantity (used for this reporting period)	Percentage of total
Australian Carbon Credit Units (ACCUs)	1,492	5%
Verified Emissions Reductions (VERs)	28,340	95%

Project description	Type of offset units	Registry	Date retired	Serial number (and hyperlink to registry transaction record)	Vintage	Stapled quantity	Eligible quantity retired (tCO ₂ -e)	Eligible quantity used for previous reporting periods	Eligible quantity banked for future reporting periods	Eligible quantity used for this reporting period	Percentage of total (%)
Darling River Conservation Initiative Site #9	ACCUs	ANREU	29/7/2024	<u>ERF132688</u> 8,332,822,187 - 8,332,829,393 (Appendix A for transaction record)	2021-22	0	1,492	0	0	1,492	5%
TASC Clean Cooking PoA - VPA 3 (Zambia)	VERs	GSF Registry	29/7/2024	GS1-1-ZM-GS11596-16-2022-25995-124351-152690	2022	0	28,340	0	0	28,340	95%
Total offsets retired this report and used in this report										29,832	
Total offsets retired this report and banked for future reports									0		

Co-benefits

Not all offset units are created equal. There's a wide range of offsets that differ in source, methodology and price. AGL undertakes a rigorous selection process when it comes to the offsets we purchase. The eligible offsets we buy meet the Carbon Neutral Standard integrity requirements set by Climate Active. There are many different offset methodologies. Some include reforestation, renewable energy, or energy efficiency projects that generate eligible offsets; projects that involve the destruction of certain industrial gases; and projects that involve the capture and destruction of methane from landfills and certain agricultural activities. Many of these projects also provide additional positive environmental and social benefits. We believe that the projects we've chosen will make a real difference. Listed below are some representative examples of projects in respect of which we have purchased offsets.

International Projects	Project ID	Description
TASC Clean Cooking Zambia	GS11596	The goal of the project is to distribute improved cookstoves (ICS) to households in Zambia. The project ICS combust biomass fuels more efficiently, reducing the greenhouse gas (GHG) emissions and particulate emissions (PM), thus improving the indoor air quality in project households. Due to the higher thermal efficiency of the ICS relative to the 3-stone fires, the ICS reduce the amount of non-renewable biomass fuel required for meeting similar thermal energy needs. Some of the SDG associated with this project include Goal 1: No Poverty, Goal 3: Good Health & Well-being, Goal 8: Decent Work & Economic Growth, and Goal 13: Climate Action.

7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) Summary

N/A

APPENDIX A: ADDITIONAL INFORMATION

Transaction ID	AU35020
Current Status	Completed (4)
Status Date	29/07/2024 14:45:21 (AEST) 29/07/2024 04:45:21 (GMT)
Transaction Type	Cancellation (4)
Transaction Initiator	Lao, Ly Kheng
Transaction Approver	Merrington, Jane
Comment	Retired on behalf of AGL and Southern Phone for CY2023 Telco Carbon Neutral Certification under Climate Active

Transferring Account

Account Number	AU-2680
Account Name	AGL Hydro Partnership
Account Holder	AGL HP1 Pty Limited

Acquiring Account


Account Number	AU-1068
Account Name	Australia Voluntary Cancellation Account
Account Holder	Commonwealth of Australia

Transaction Blocks

<u>Party</u>	<u>Type</u>	<u>Transaction Type</u>	<u>Original CP</u>	<u>Current CP</u>	<u>ERF Project ID</u>	<u>NGER Facility ID</u>	<u>NGER Facility Name</u>	<u>Safeguard</u>	<u>Kyoto Project #</u>	<u>Vintage</u>	<u>Expiry Date</u>	<u>Serial Range</u>	<u>Quantity</u>
AU	KACCU	Voluntary ACCU Cancellation			ERF132688					2021-22		8,332,822,187 - 8,332,823,678	1,492

Transaction Status History

<u>Status Date</u>	<u>Status Code</u>
29/07/2024 14:45:21 (AEST) 29/07/2024 04:45:21 (GMT)	Completed (4)
29/07/2024 14:45:21 (AEST) 29/07/2024 04:45:21 (GMT)	Proposed (1)
29/07/2024 14:45:21 (AEST) 29/07/2024 04:45:21 (GMT)	Account Holder Approved (97)
29/07/2024 11:51:23 (AEST) 29/07/2024 01:51:23 (GMT)	Awaiting Account Holder Approval (95)

PROJECT ISSUED TO	TASC Clean Cooking PoA - VPA 3 (Zambia) (GS11596)	VIEW PROJECT
PROJECT'S POA	TASC Clean Cooking PoA (GS11009)	VIEW POA
SERIAL NUMBER	GS1-1-ZM-GS11596-16-2022-25995-124351-152690	
STATUS	↓↓ Retired	PRODUCT  VER
NUMBER OF CREDITS	28340	MONITORING PERIOD Jul 24, 2022 — Jun 02, 2023
ISSUANCE DATE	Jan 16, 2024	VINTAGE 2022

RETIREMENT DETAILS

RETIREMENT DATE	Jul 29, 2024	VIEW CERTIFICATE	VIEW RETIREMENT
RETIREMENT NOTE	<i>Retired on behalf of AGL and Southern Phone for CY2023 Telco Carbon Neutral Certification under Climate Active (This note is private. Only you can see it.)</i>		
USING ENTITY	AGL Southern Phone <i>(This entity is private. Only you can see it.)</i>		
USE CASE	Voluntary		
USE CASE AUTHORISATION	Not Applicable		

APPENDIX B: ELECTRICITY SUMMARY

N/A

APPENDIX C: INSIDE EMISSIONS BOUNDARY

Non-quantified emission sources

The following emissions sources have been assessed as attributable, are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. These emissions are accounted for through an uplift factor. They have been non-quantified due to one of the following reasons:

1. **Immaterial** <1% for individual items and no more than 5% collectively.
2. **Cost effective** Quantification is not cost effective relative to the size of the emission but uplift applied.
3. **Data unavailable** Data is unavailable but uplift applied. A data management plan must be put in place to provide data within 5 years.
4. **Maintenance** Initial emissions non-quantified but repairs and replacements quantified.

Relevant non-quantified emission sources	Justification reason
N/A	N/A

Excluded emission sources

Attributable emissions sources can be excluded from the carbon inventory, but still considered as part of the emissions boundary if they meet **all three of the below criteria**. An uplift factor may not necessarily be applied.

1. A data gap exists because primary or secondary data cannot be collected (**no actual data**).
2. Extrapolated and proxy data cannot be determined to fill the data gap (**no projected data**).
3. An estimation determines the emissions from the process to be **immaterial**).

Emissions Source	No actual data	No projected data	Immaterial
N/A			

Data management plan for non-quantified sources

There are no non-quantified sources in the emission boundary that require a data management plan.

APPENDIX D: OUTSIDE EMISSIONS BOUNDARY

Non-attributable emissions have been assessed as not attributable to a product or service (do not carry, make or become the product/service) and are therefore not part of the carbon neutral claim. To be deemed attributable, an emission must meet two of the five relevance criteria. Emissions which only meet one condition of the relevance test can be assessed as non-attributable and therefore are outside the carbon neutral claim. Non-attributable emissions are detailed below.

1. **Size** The emissions from a particular source are likely to be large relative to other attributable emissions.
2. **Influence** The responsible entity could influence emissions reduction from a particular source.
3. **Risk** The emissions from a particular source contribute to the responsible entity's greenhouse gas risk exposure.
4. **Stakeholders** The emissions from a particular source are deemed relevant by key stakeholders.
5. **Outsourcing** The emissions are from outsourced activities that were previously undertaken by the responsible entity or from outsourced activities that are typically undertaken within the boundary for comparable products or services.

Non-attributable emissions sources summary

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
Network Infrastructure embodied emissions	Y	N	N	N	N	<p>Size: The emissions source is likely to be large relative to other major emissions sources; there is no way to accurately estimate the contribution.</p> <p>Influence: We do not have the potential to influence the emissions from this source, including by shifting to a different lower-emissions supplier for our product as this infrastructure is owned and managed by other organisations.</p> <p>Risk: There are no relevant laws or regulations that apply to limit emissions specifically from this source, the source does not create supply chain risks, and it is unlikely to be of significant public interest.</p> <p>Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for our product/service.</p> <p>Outsourcing: We have not previously undertaken this activity within our emissions boundary and comparable products/services do not typically undertake this activity within their boundary.</p>



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