



PUBLIC DISCLOSURE STATEMENT

TELSTRA ENERGY

**PRODUCT CERTIFICATION
FY2023-24**

Australian Government

Climate Active Public Disclosure Statement



An Australian Government Initiative



NAME OF CERTIFIED ENTITY	Telstra Energy (Retail) Pty Ltd
REPORTING PERIOD	1 July 2023 – 30 June 2024 Arrears report
DECLARATION	<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>  Justine Rowe Chief Sustainability Officer 30 October 2024



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

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Version 9.

1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	1,361 tCO ₂ -e
CARBON OFFSETS USED	100% VCU's
RENEWABLE ELECTRICITY	21.72% (in operations (scope 2))
CARBON ACCOUNT	Prepared by: Telstra Group
TECHNICAL ASSESSMENT	23/04/2021 Deloitte Australia

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2.CERTIFICATION INFORMATION

Description of product certification

This product certification is for retail electricity and retail gas sold by Telstra Energy (Retail) Pty Ltd (ABN 23 645 100 447). For retail electricity this involves offsetting all relevant and attributable greenhouse gas (GHG) emissions associated with the electricity sourced from the National Electricity Market (NEM) and delivered to the point of consumption (or customer meter). For retail gas this involves offsetting all relevant and attributable GHG emissions associated with the gas procured from Australia's eastern gas market and delivered to the point of combustion.

Telstra Energy's retail electricity and gas business connects energy generators to end-use customers, providing customers with a mix of fossil fuels and renewable energy. To reduce reliance on fossil fuels and increase renewable energy provided to customers, Telstra Energy is actively investing in renewable energy projects that connect into the electricity grid. Telstra Energy's carbon neutral retail electricity and gas products are a full coverage product whereby GHG emissions of both offerings are offset entirely with no other non-carbon neutral options. A cradle-to-grave lifecycle approach has been applied to the assessment and offset of GHG emissions for both products.

Functional Units

- Retail Electricity: The functional unit relevant to the electricity product is megawatt hours (MWh). Total consumption of the electricity product by customers is measured as MWh per financial year.
- Retail Gas: The functional unit for the carbon neutral gas product is gigajoules (GJ). Total consumption of the gas product by customers is measured via gas meters as GJ per financial year.

The GHG emissions associated with operating the Telstra Energy business have also been assessed and are offset under Telstra Group Limited's (Telstra) carbon neutral certification as they are a fundamental component of selling retail products to customers. Under the Climate Active standard, GHG emissions shared between Telstra Energy and Telstra can be nullified as carbon neutral under the Parent-Child relationship (as per page 52 of the Climate Active Technical Manual).

Telstra Energy have provided retail electricity on a trial basis to a limited number of customers. There has been no retailing of gas.

This is the final certification for Telstra Energy as Telstra Group moves away from offsetting the emissions from its operations towards a focus on direct emissions reductions. Refer to our website for more information regarding this change: [How we're evolving our climate change commitments \(telstra.com.au\)](https://www.telstra.com.au/climate).

This Public Disclosure Statement includes information for FY2023-2024 reporting period.

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.

Diagram 3.1.1 | Telstra Energy retail electricity boundary

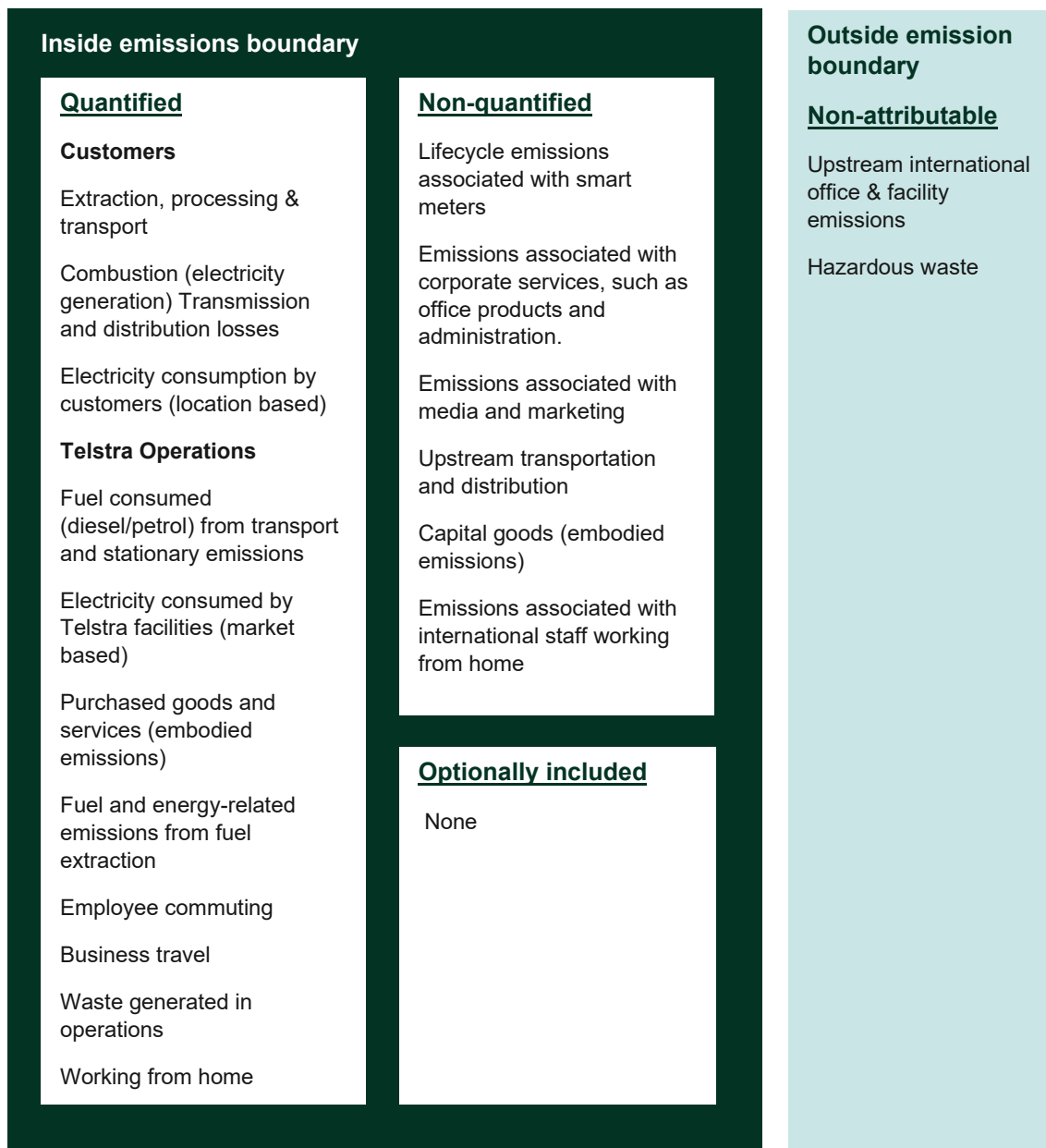
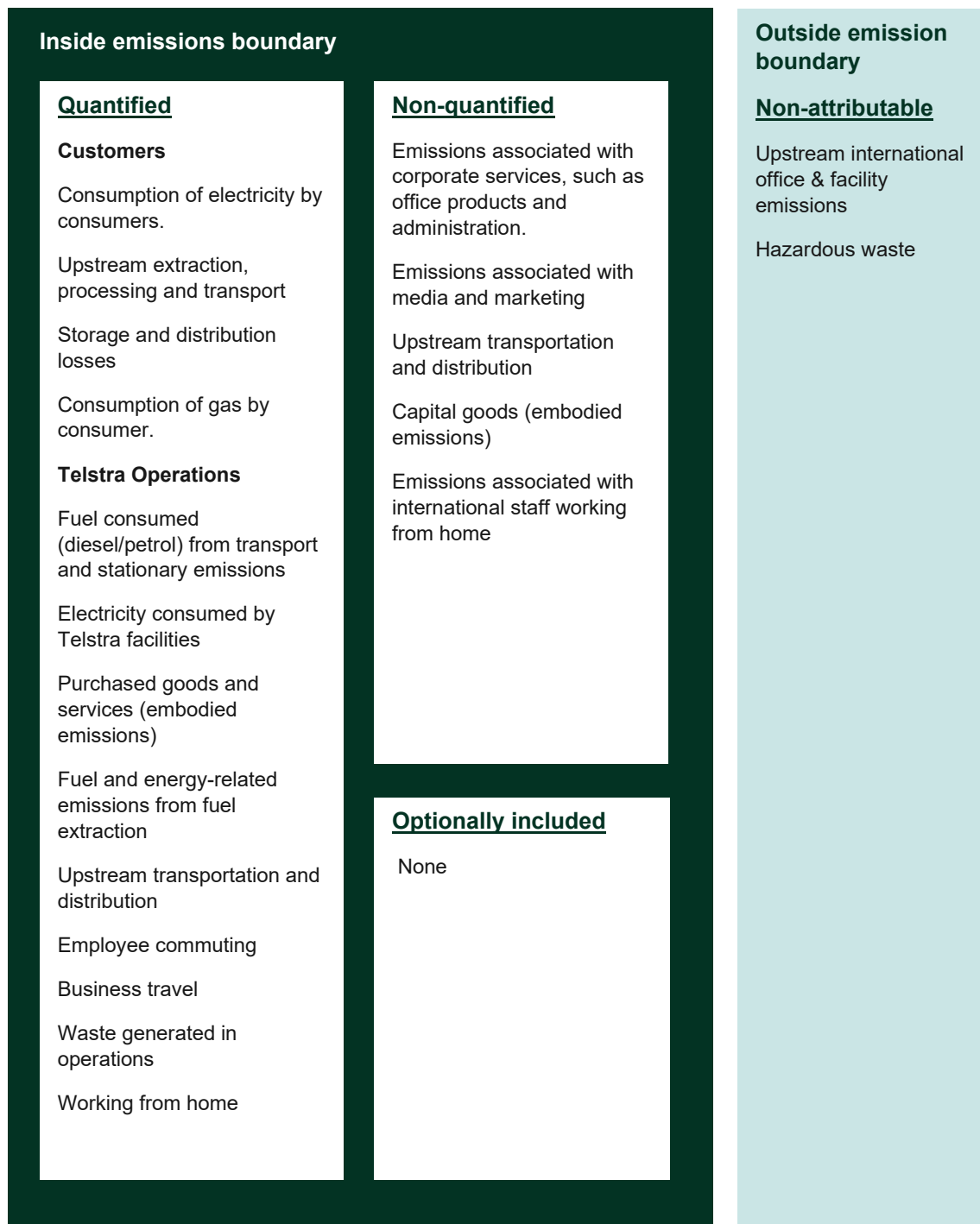


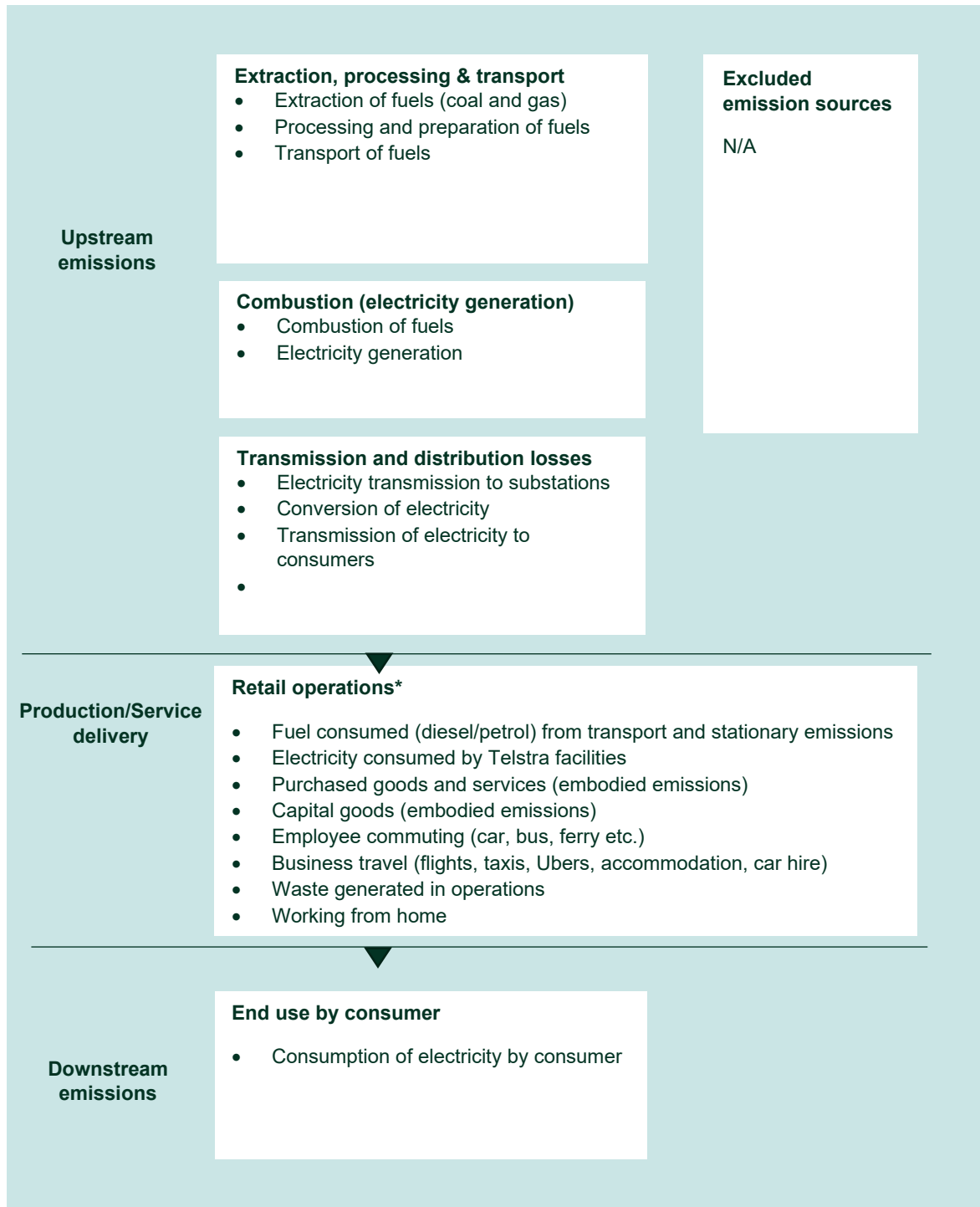
Diagram 3.1.2 | Telstra Energy retail gas boundary



Product / Service process diagram

Diagram 3.2.1 | Telstra Energy retail electricity | Product process diagram

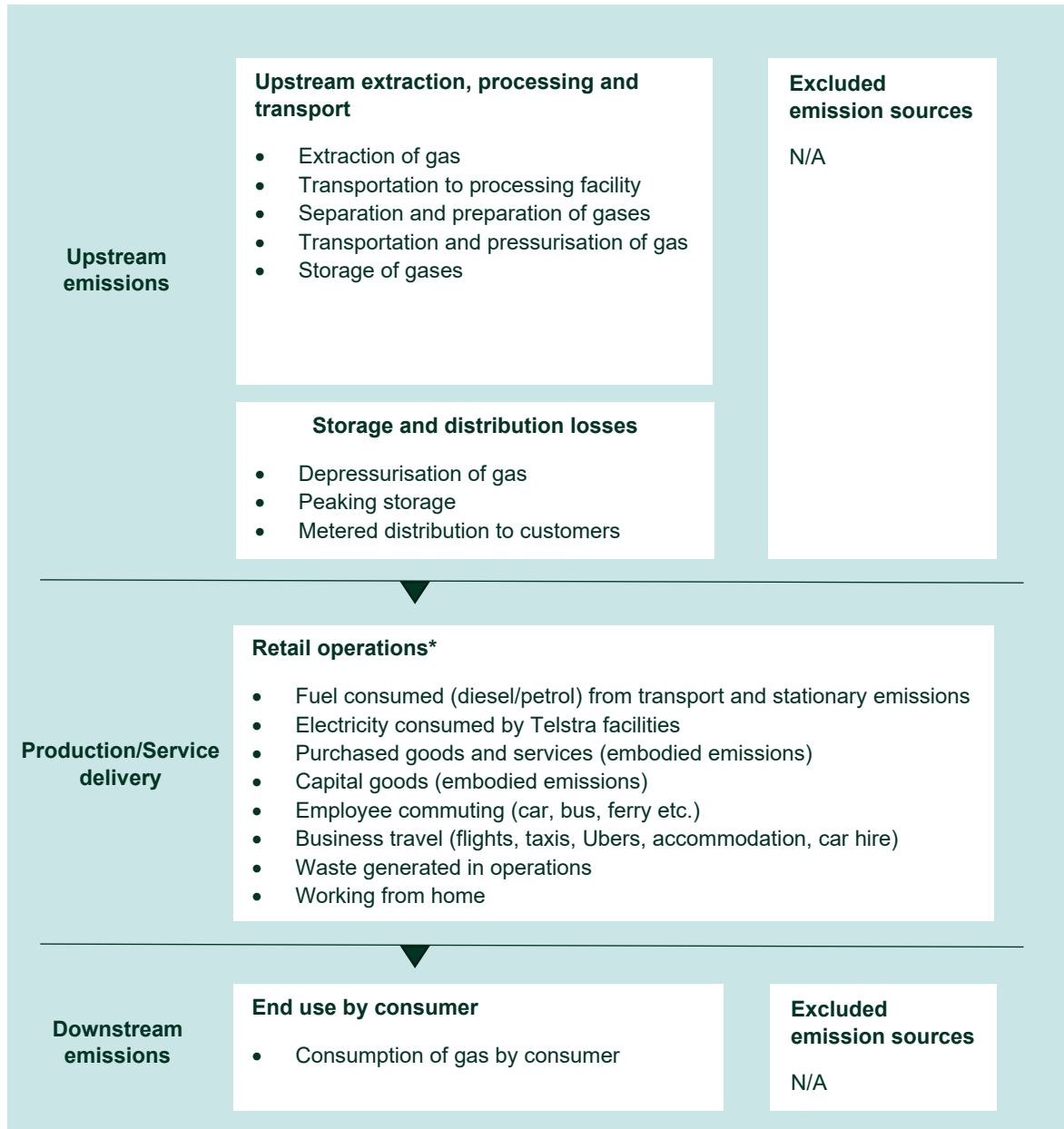
Cradle-to-grave



*emissions shared with Telstra's organisational certification

Diagram 3.2.2 | Telstra Energy retail gas | Product process diagram

Cradle-to-grave



*emissions shared with Telstra's organisational certification

4.EMISSIONS REDUCTIONS

Emissions reduction strategy

We are aware that providing retail energy services results in GHG emissions. We also recognise that reducing our GHG emissions not only brings tangible business benefits but also allows us to provide our customers with additional value from efficiency and innovations in our products and services.

Our Telstra Energy product trial has had a strong focus on the usage of IoT and smart metering to provide customers with better visibility of their power consumption. We complemented this with information about the amount of renewable energy currently being generated in the grid, to encourage customers to use energy at times of high renewable penetration.

Our Telstra sustainability strategy is driven by taking climate action and working towards a circular economy which are underpinned by the following key targets:

- Reduce our absolute scope 1+2 emissions by 70% by 2030 from an FY19 baseline
- Reduce our absolute scope 3 emissions by 50% by 2030 from an FY19 baseline
- Enable renewable energy generation equivalent to 100% of our consumption by 2025
- Reuse or recycle 650,000 mobile phones, modems, and other devices each year to 2025
- Increase our network waste recycling rate to 90 per cent by 2025.

Telstra Energy aims to contribute to Telstra's sustainability strategy by focussing on:

- Decarbonising Telstra by becoming more energy efficient, reducing our consumption and investing in renewable energy
- Decarbonising the grid by investing in renewable energy and helping our customers access renewables for their energy needs
- Contributing to decarbonising our economy by improving the efficiency of our products and investing in technology that helps to address our most significant environmental challenges
- Adapting to climate impacts by using the best available science to understand these impacts so we can build resilience into our decision making, products and infrastructure.

Please refer to [Telstra's Sustainability Report 2024](#) for further information on Telstra's Emissions Reduction Strategy.

Emissions reduction actions

Telstra Energy has focused on decarbonising the grid through greater investment in renewable energy, thereby reducing reliance on non-renewable energy from fossil fuels. To date, we have supported renewable energy projects worth over \$1.4 billion renewable energy by entering into long term Power Purchase Agreements. These commitments support the construction of renewable energy projects across Queensland, Victoria and New South Wales. We have now contracted renewable energy generation which, once fully up and running, is projected to be equivalent to more than 100 per cent of our forecast consumption by the end of 2025. Refer table 4.1 for a list of our Power Purchase Agreements.

Table 4.1: Telstra Power Purchase Agreements

Site	Location	Year signed
Murra Warra Wind Farm	Victoria	2017
Emerald Park Solar Farm	Queensland	2017
Crookwell III Wind Farm	NSW	2021
MacIntyre Wind Farm	Queensland	2022
Munna Creek Solar Farm	Queensland	2023
Bundaberg Solar Farm	Queensland	2023
Glenellen Solar Farm	NSW	2023

5.EMISSIONS SUMMARY

Emissions over time

Table 5.1.1 – Electricity product

Emissions since base year			
		Total tCO ₂ -e	Emissions intensity of the functional unit
Base year:	2021-22	159,495	0.91 tCO ₂ -e / MWh
True Up:	2021-22	221 ¹	2.40 tCO ₂ -e / MWh
Year 2:	2022-23	1,061 ²	0.95 tCO ₂ -e / MWh
Year 3:	2023-24	1,361 ³	0.86 tCO ₂ -e / MWh

Table 5.1.2 - Gas product

Emissions since base year			
		Total tCO ₂ -e	Emissions intensity of the functional unit
Base year:	2021-22	27,786	0.06 tCO ₂ -e / GJ
True Up:	2021-22	0	0 tCO ₂ -e / GJ
Year 2:	2022-23	0	0 tCO ₂ -e / GJ
Year 3:	2023-24	0	0 tCO ₂ -e / GJ

Significant changes in emissions

Table 5.2 – 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
Electricity sold to customers (Scope 2, market method)	2,905	859	The decrease in Scope 2 emissions driven by a decrease in the Parent-Child apportionment factor used to allocate emissions relevant to Telstra's certification as well as a reduction in Telstra Energy employees.
Organisation Electricity (Scope 2, market method)	767	1,039	The increase was driven by an increase in electricity sold to customers

¹ The total emissions associated with the electricity product in FY22 was 3,232 tCO₂-e. The 221 tCO₂-e represents the attributable emissions that were not already offset under Telstra's Parent-Child relationship.

² The total emissions associated with this product are 4,713 tCO₂-e. The 1,061 tCO₂-e represents the attributable emissions that have not already been offset under Telstra's Parent-Child relationship.

³ The total emissions associated with this product are 2,439 tCO₂-e. The 1,361 tCO₂-e represents the attributable emissions that have not already been offset under Telstra's Parent-Child relationship.

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

No existing carbon neutral products are used in the direct delivery of Telstra Energy's retail electricity and gas products.

Emissions summary⁴

Table 5.3.1 – Electricity product

Emission source	tCO ₂ -e	Overlap with Telstra (%)	Offset for FY24 (tCO ₂ -e)
Consumption of electricity by consumers	1,039	0%	1,039
Transport and stationary fuel (natural gas, diesel, petrol, LPG, ethanol)	38	100%	0
Electricity purchased from the Australian electricity grid, including transmission losses (market-based approach)	859	100%	0
Purchased goods and services (embodied emissions)	192	0%	192
Fuel and energy related activities	245	47%	130
Waste generated in operations	3	100%	0
Business travel	6	100%	0
Employee commuting	57	100%	0
Attributable emissions (tCO₂-e)	2,439		1,361

Product / Service offset liability	
Emissions intensity per functional unit	0.86 tCO ₂ -e / MWh
Emissions intensity per functional unit including uplift factors	N/A
Number of functional units covered by the certification	Commercial in confidence
Total emissions (tCO₂-e) to be offset	1,361

⁴ Any emissions source that overlaps with Telstra Organisation has been allocated to Telstra Energy based on proportion of FTE. These emissions totals are then assessed to determine if they have already been offset under Telstra's Organisation Climate Active certification.

Table 5.3.2 – Gas product

Emission source	tCO ₂ -e	Overlap with Telstra (%)	Offset for FY24 (tCO ₂ -e)
Consumption of electricity by consumers	0	0%	0
Transport and stationary fuel (natural gas, diesel, petrol, LPG, ethanol)	0	100%	0
Electricity purchased from the Australian electricity grid, including transmission losses (market-based approach)	0	100%	0
Purchased goods and services (embodied emissions)	0	0%	0
Fuel and energy related activities	0	100%	0
Waste generated in operations	0	100%	0
Business travel	0	100%	0
Employee commuting	0	100%	0
Attributable emissions (tCO₂-e)	0		0

Product / Service offset liability	
Emissions intensity per functional unit	0
Emissions intensity per functional unit including uplift factors	N/A
Number of functional units covered by the certification	0
Total emissions (tCO₂-e) to be offset	0 tCO₂-e

6. CARBON OFFSETS

Eligible offsets retirement summary

Offsets retired for Climate Active certification

Type of offset unit	Quantity used for this reporting period	Percentage of total units used
Verified Carbon Units (VCUs)	1,361	100.00%

Project name	Type of offset unit	Registry	Date retired	Serial number	Vintage	Total quantity retired	Quantity used in previous reporting periods	Quantity banked for future reporting periods	Quantity used for this reporting period	Percentage of total used this reporting period
ReNew Solar Power Project by ReNew Solar Power Private Limited, India	VCU	Verra Registry	13/09/2022	11584-341512784-341766065-VCS-VCU-997-VER-IN-1-1851-01012020-31122020-0	2020	253,282	251,922 ⁵	0	1,361	100.00%

⁵ 71,498 offsets were used in 2023 reporting for Telstra Group and on behalf of St Vincent de Paul. The following allocations have been used in 2024 for other Telstra related Climate Active certifications - Telstra Mobile Plans (86,038), Telstra Group (59,910) and Belong (34,475).

Co-benefits

The main purpose of this project activity is to generate electricity through renewable solar energy sources. The project activity involves total capacity of 977 MW solar power project which are installed in Gujarat, Karnataka, Madhya Pradesh, Rajasthan and Telangana states of India. The solar projects have been developed by the SPVs of ReNew Power Limited. Over the 10 years of first crediting period, the project will replace anthropogenic emissions estimated to be approximately 1,511,532 tCO₂-e per year, displacing 1,595,299 MWh/year amount of electricity from the generation-mix of power plants connected to the Indian grid.

7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) Summary

N/A

APPENDIX A: ADDITIONAL INFORMATION

APPENDIX B: ELECTRICITY SUMMARY

There are two international best-practice methods for calculating electricity emissions – the location-based method and the market-based method. Reporting electricity emissions under both methods is called dual reporting.

Dual reporting of electricity emissions is useful, as it provides different perspectives of the emissions associated with a business's electricity usage.

Location-based method

The location-based method provides a picture of a business's electricity emissions in the context of its location, and the emissions intensity of the electricity grid it relies on. It reflects the average emissions intensity of the electricity grid in the location (State) in which energy consumption occurs. The location-based method does not allow for any claims of renewable electricity from grid-imported electricity usage.

Market-based method

The market-based method provides a picture of a business's electricity emissions in the context of its renewable energy investments. It reflects the emissions intensity of different electricity products, markets and investments. It uses a residual mix factor (RMF) to allow for unique claims on the zero emissions attribute of renewables without double-counting.

For this certification, electricity emissions have been set by using the market-based approach.

This Appendix Electricity Summary refers to electricity consumed by Telstra Energy in operations (scope 2) and not electricity sold to customers (scope 3).

Market-based approach summary			
Market-based approach	Activity Data (kWh)	Emissions (kgCO ₂ -e)	Renewable percentage of total
Behind the meter consumption of electricity generated	14,267	0	1%
Total non-grid electricity	14,267	0	1%
LGC Purchased and retired (kWh) (including PPAs)	0	0	0%
GreenPower	0	0	0%
Climate Active precinct/building (voluntary renewables)	0	0	0%
Precinct/Building (LRET)	0	0	0%
Precinct/Building jurisdictional renewables (LGCS surrendered)	0	0	0%
Electricity products (voluntary renewables)	0	0	0%
Electricity products (LRET)	0	0	0%
Electricity products jurisdictional renewables (LGCs surrendered)	0	0	0%
Jurisdictional renewables (LGCs surrendered)	28,990	0	2%
Jurisdictional renewables (LRET) (applied to ACT grid electricity)	7,321	0	1%
Large Scale Renewable Energy Target (applied to grid electricity only)	243,664	0	18%
Residual Electricity	1,060,755	965,287	0%
Total renewable electricity (grid + non grid)	294,242	0	22%
Total grid electricity	1,340,729	965,287	21%
Total electricity (grid + non grid)	1,354,997	965,287	22%
Percentage of residual electricity consumption under operational control	100%		
Residual electricity consumption under operational control	1,060,755	965,287	
Scope 2	944,188	859,211	
Scope 3 (includes T&D emissions from consumption under operational control)	116,566	106,075	
Residual electricity consumption not under operational control	0	0	
Scope 3	0	0	

Total renewables (grid and non-grid)	21.72%
Mandatory	18.52%
Voluntary	2.14%
Behind the meter	1.05%
Residual scope 2 emissions (t CO₂-e)	859.21
Residual scope 3 emissions (t CO₂-e)	106.08
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	859.21
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	106.08
Total emissions liability (t CO₂-e)	965.29

Figures may not sum due to rounding. Renewable percentage can be above 100%

Location-based approach summary						
Location-based approach	Activity Data (kWh) total	Under operational control			Not under operational control	
Percentage of grid electricity consumption under operational control	100%	(kWh)	Scope 2 Emissions (kgCO ₂ -e)	Scope 3 Emissions (kgCO ₂ -e)	(kWh)	Scope 3 Emissions (kgCO ₂ -e)
ACT	39,107	39,107	26,593	1,955	0	0
NSW	451,554	451,554	307,057	22,578	0	0
SA	89,881	89,881	22,470	7,190	0	0
VIC	332,572	332,572	262,732	23,280	0	0
QLD	246,877	246,877	180,220	37,032	0	0
NT	19,358	19,358	10,454	1,355	0	0
WA	132,041	132,041	69,982	5,282	0	0
TAS	29,338	29,338	3,521	293	0	0
Grid electricity (scope 2 and 3)	1,340,729	1,340,729	883,028	98,965	0	0
ACT	1	1	0	0		
NSW	1,114	1,114	0	0		
SA	1,172	1,172	0	0		
VIC	1,086	1,086	0	0		
QLD	3,422	3,422	0	0		
NT	2,025	2,025	0	0		
WA	5,285	5,285	0	0		
TAS	163	163	0	0		
Non-grid electricity (behind the meter)	14,267	14,267	0	0		
Total electricity (grid + non grid)	39,107	39,107	26,593	1,955	0	0

Residual scope 2 emissions (t CO₂-e)	883.03
Residual scope 3 emissions (t CO₂-e)	98.97
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	883.03
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	98.97
Total emissions liability	981.99

Operations in Climate Active buildings and precincts

Operations in Climate Active buildings and precincts	Electricity consumed in Climate Active certified building/precinct (kWh)	Emissions (kg CO ₂ -e)
Nil	0	0
Climate Active carbon neutral electricity is not renewable electricity. These electricity emissions have been offset by another Climate Active member through their building or precinct certification. This electricity consumption is also included in the market based and location-based summary tables. Any electricity that has been sourced as renewable electricity by the building/precinct under the market-based method is outlined as such in the market based summary table.		

Climate Active carbon neutral electricity products

Climate Active carbon neutral product used	Electricity claimed from Climate Active electricity products (kWh)	Emissions (kg CO ₂ -e)
<i>Nil</i>	0	0
<i>Climate Active carbon neutral electricity is not renewable electricity. These electricity emissions have been offset by another Climate Active member through their electricity product certification. This electricity consumption is also included in the market based and location-based summary tables. Any electricity that has been sourced as renewable electricity by the electricity product under the market-based method is outlined as such in the market based summary table.</i>		

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
Lifecycle emissions associated with smart meters	Immaterial
Emissions associated with corporate services, such as office products and administration	Immaterial
Emissions associated with media and marketing	Immaterial
Upstream transportation and distribution	Immaterial
Capital goods (embodied emissions)	Immaterial
Emissions associated with international staff working from home	Immaterial

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**).

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 EMISSION 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
Upstream international office & facility emissions	N	N	N	N	N	Size: No – Telstra Energy's products and services are only provided to domestic customers. As such an apportionment of Telstra's international upstream assets would not be material. Influence: No - As a business unit of Telstra, with no international customer base, Telstra Energy has a limited ability to influence decisions surrounding the international leasing of assets. Risk: No - As Telstra Energy's products and services are only provided to domestic customers, the GHG risk associated with upstream leased assets would be immaterial. Further, Telstra's international leased assets are reported under the Telstra Organisation Public Disclosure Statement. Stakeholders: No - As Telstra Energy's products and services are only provided to domestic customers, it is deemed that emissions associated with international leased assets would not be of concern to stakeholders. Outsourcing: No - While these emissions are generated from international operations, it is typically measured and managed by Telstra
Hazardous Waste	N	N	N	N	N	Size: No – Telstra Energy does not create or store any hazardous waste as defined by the Australian Government Department of Industry. Influence: As above. Risk: As above. Stakeholders: As above. Outsourcing: As above.



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