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PUBLIC DISCLOSURE STATEMENT

AGL ENERGY LIMITED

**PRODUCT CERTIFICATION
SOLAR BATTERIES
CY2024**

Australian Government
Climate Active
Public Disclosure Statement



NAME OF CERTIFIED ENTITY	AGL Energy Limited
REPORTING PERIOD	1 January 2024- 31 December 2024 (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>Signature here</p> 
	<p>Name of signatory Jane Butler Position of signatory General Manager, Electrification and Innovation Date 29.05.2026</p>



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

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Version 9.1.



1. CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	635 tCO ₂ -e
CARBON OFFSETS USED	5% ACCUs, 95% VERs
RENEWABLE ELECTRICITY	N/A
CARBON ACCOUNT	Prepared by: Environmental Resources Management (ERM)
TECHNICAL ASSESSMENT	23/05/2025 (CY2024) Ken De Negri, Environmental Resources Management (ERM) Next technical assessment due: CY2027

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2. CERTIFICATION INFORMATION

Description of product certification

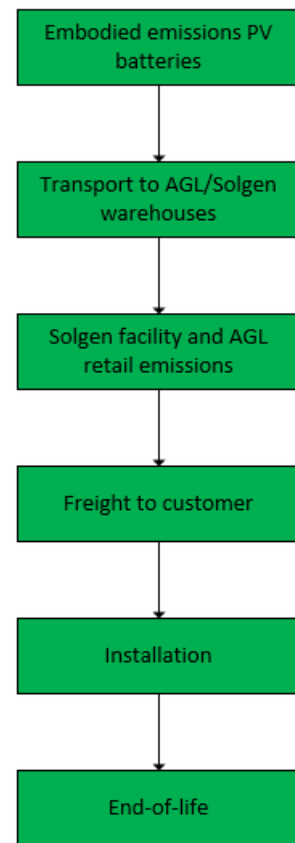
This public disclosure statement supports the carbon neutral product certification for the supply and installation of solar battery systems provided by AGL Energy Limited. This includes the Life Cycle Assessment of the solar batteries and quantification of Scope 1, 2 and 3 emissions associated with the retail operations component.

The emissions reported here are for CY2024 which is the fourth year of certification.

Since June 2021, AGL Energy Limited has offered a certified Carbon Neutral Solar Battery Systems product to all residential customers. Solar Battery Systems are sold to residential customers either as a standalone product or as part of a solar and battery bundle.

‘Solar Battery Systems product’ includes all components and services associated with the supply and installation of solar battery systems sold by AGL Energy Limited subsidiary businesses – AGL Energy Services Pty Limited. The solar battery is a product that allows AGL customers to store excess electricity generated by their solar panels and/or to charge from the grid. Since June 2021, AGL Energy Limited has included its certified Carbon Neutral Solar Battery Systems product for all residential customers, who purchase a solar battery either as a standalone product, or as part of a solar and battery bundle.

- Functional unit: 1 kWh capacity will be used as a quantifiable reference to the associated greenhouse gas emissions of a solar battery product.
- Offered as: Opt-in for Commercial customers (C&I) and full coverage for residential customers.
- Life cycle: cradle-to-grave



Solar Battery process map

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

This Public Disclosure Statement includes information for CY2024 reporting period.

Description of business

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 7,982 MW (as at 30 June 2024)¹. AGL's operated generation accounted for approximately 20% of the total generation within the National Electricity Market in FY24. AGL operates the largest electricity generation portfolio within the NEM of any ASX-listed company, as at 30 June 2024.

- AGL includes related bodies corporate covered by this certification, 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.
- 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 centre.
 - 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.

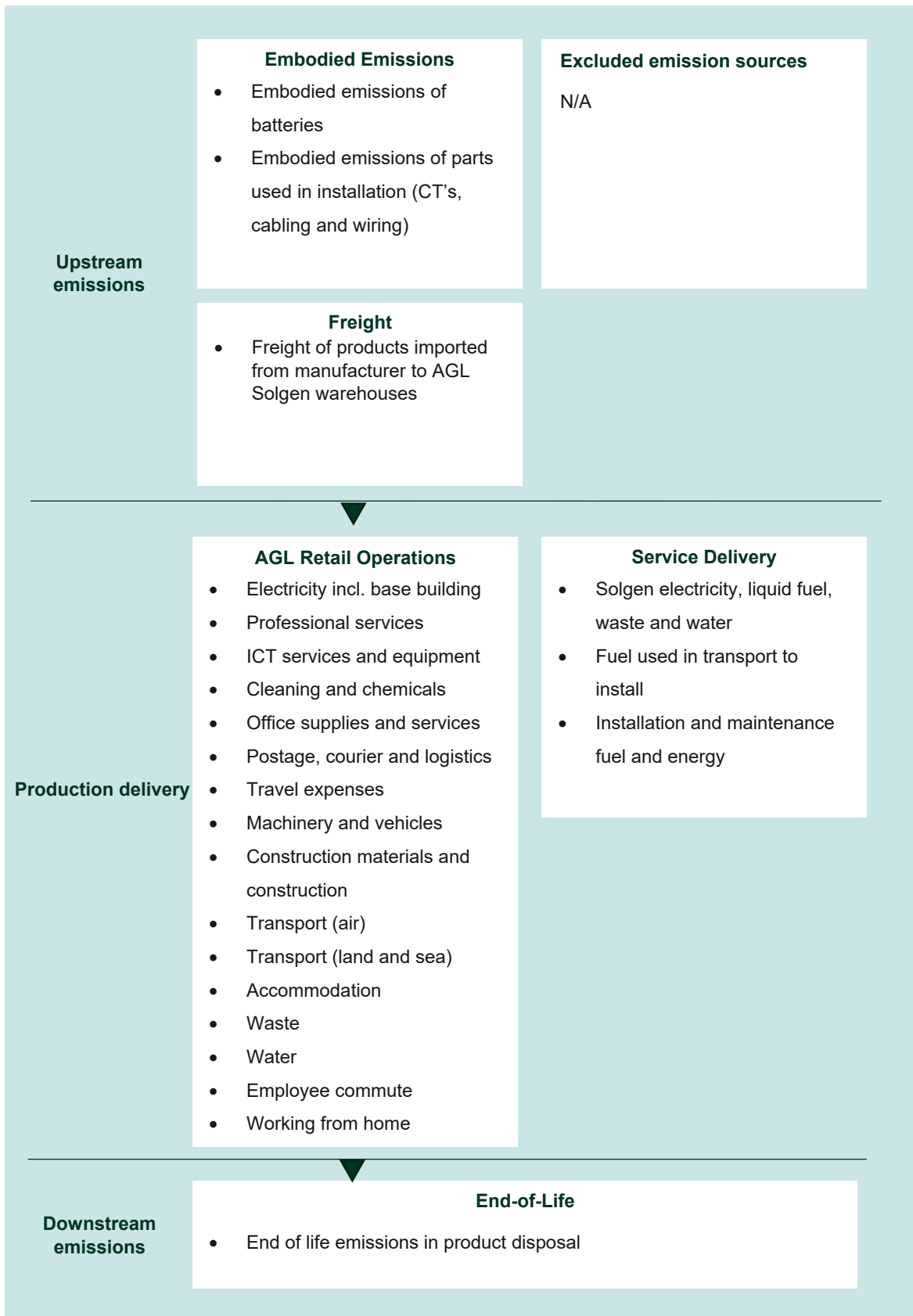
Non-quantified emissions have been assessed as attributable and are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. All material emissions are accounted for through an uplift factor. Further detail is available at Appendix C.

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.

Product 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.

In September 2022 AGL released its inaugural Climate Transition Action Plan (CTAP), which outlines AGL's commitments to the following²:

- Close Loy Yang A Power Station by the end of FY35.³
- 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.^{4,5}
- 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 by the end of 2035.

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.

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.

² AGL released an updated Climate Transition Action Plan in August 2025. As this PDS applies to the 2024 period, it outlines commitments from the prior 2022 CTAP which was in effect during this period. ³ 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 The ability for AGL to execute on this target will be subject to uncertainties and risks, as described on page 12 of AGL's 2022 Climate Transition Action Plan, September 2022.

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.

5. EMISSIONS SUMMARY

Emissions over time

C&I Batteries

Emissions since base year			
		Total tCO ₂ -e	Emissions intensity of the functional unit
Base year:	CY2021	19.17	0.35
Year 2:	CY2022	8.22 ⁶	-
Year 3:	CY2023	0	0.23
Year 4:	CY2024	0	0.25

* Please note that there were no carbon neutral sales for C&I batteries in CY2024

Residential Batteries

Emissions since base year			
		Total tCO ₂ -e	Emissions intensity of the functional unit
Base year:	CY2021	457.14	0.15
Year 2:	CY2022	1,149.26	0.13
Year 3:	CY2023	1,251.87	0.23
Year 4:	CY2024	635	0.23

Significant changes in emissions

C&I Batteries

Significant changes in emissions			
Attributable process	Previous year emissions (t CO ₂ -e)	Current year emissions (t CO ₂ -e)	Reason for change
Embodied emissions batteries	129	1,970	Increase in overall kWh capacity installed for AGL C&I customers in CY2024

Residential batteries

Significant changes in emissions			
Attributable process	Previous year emissions (t CO ₂ -e)	Current year emissions (t CO ₂ -e)	Reason for change
Embodied emissions batteries	1,052	532	Increase in overall kWh capacity installed for AGL customers in CY2024

⁶ This CY2022 value represents the organisational emissions only, which is why there is no emissions intensity

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

N/A

Emissions summary

C&I batteries

C&I is an opt-in carbon neutral product. The below summary represents entire product.

Life cycle stage / Attributable process / Emission source	tCO ₂ -e
Embodied emissions	1,969.58
Freight (land and sea)	29.52
Installation and maintenance	132.59
Solgen warehouse (electricity, fuel, waste and water)	155.25
AGL retail emissions	34.79
Attributable emissions (tCO₂-e)	2,321.73

Product offset liability	
Emissions intensity per functional unit (tCO ₂ -e/kWh capacity)	0.25
Emissions intensity per functional unit including uplift factors	N/A
Number of functional units covered by the certification (kWh capacity installed)	0
Total emissions (tCO₂-e) to be offset	0.00

Residential batteries

Residential is a full coverage carbon neutral product. The below summary represents the entire product.

Life cycle stage / Attributable process / Emission source	tCO ₂ -e
Embodied emissions	532.31
Freight (land and sea)	5.97
Installation and maintenance	39.82
Solgen warehouse (electricity, fuel, waste and water)	46.27
AGL retail emissions	9.72
Attributable emissions (tCO₂-e)	635

Product offset liability	
Emissions intensity per functional unit (tCO ₂ -e/kWh capacity)	0.23
Emissions intensity per functional unit including uplift factors	N/A
Number of functional units covered by the certification (kWh capacity installed)	2,721
Total emissions (tCO₂-e) to be offset	635

6. CARBON OFFSETS

Eligible offsets retirement summary

This certification has taken an in-arrears offsetting approach. The total greenhouse gas emissions to offset is 635 tCO₂e.

The total number of eligible offsets used in this report is 635. Of the total eligible offsets used, zero were previously banked and 635 were newly purchased and retired. Zero are remaining and have been banked for future use.

Offsets retired for Climate Active certification

Type of offset unit	Quantity used for this reporting period	Percentage of total units used
Australian Carbon Credit Units (ACCU)s	32	5%
Verified Emissions Reductions (VERs)	603	95%

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
TASC Clean Cooking PoA – VPA 1 (Zambia)	VERs	GSF Registry	17/06/2025	<u>GS1-1-ZM-GS11145-16-2023-25994-14400-15001</u>	2023	602	0	0	602	94.8%
Byzantium Induced Regeneration of Native Forest Project	ACCUs	ANREU	17/06/2025	8,409,887,003 – 8,409,887,034 (Appendix A for transaction record)	2023-24	32	0	0	32	5%
TASC Clean Cooking PoA – VPA 1 (Zambia)	VERs	GSF Registry	13/02/2026	<u>GS1-1-ZM-GS11145-16-2023-25994-16028-16028</u>	2023	1	0	0	1	0.2%
Offset Totals:						635	0	0	635	100%

7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) Summary

N/A

APPENDIX A: ADDITIONAL INFORMATION

Transaction ID		AU42118															
Current Status		Completed (4)															
Status Date		17/06/2023 15:01:29 (AEST)															
		17/06/2023 05:01:29 (QMT)															
Transaction Type		Cancellation (4)															
Transaction Initiator		Lan, Ly Pheng															
Transaction Approver		Chen, Siu															
Comment		Retired on behalf of AGL for CY2024 Batteries Carbon Neutral Certification under Climate Active															
Transferring Account						Acquiring Account											
Account Number		AU-2880						Account Number		AU-1008							
Account Name		AGL Hydro Partnership						Account Name		Australia Voluntary Cancellation Account							
Account Holder		AGL HPI Pty Limited						Account Holder		Commonwealth of Australia							
Transaction Blocks																	
Party	Type	Transaction Type	Original CP	Current CP	ERC Project ID	NCR Facility ID	NCR Facility Name	Safeguard	Kyoto Project #	Vintage	Expiry Date	Serial Range	Quantity				
AU	KACC	Voluntary ACCU Cancellation			ERC10206					2022-24		8,409,887,033 - 8,409,887,034	2				
Transaction Status History																	
Status Date		Status Code															
17/06/2023 15:01:29 (AEST)		Completed (4)															
17/06/2023 05:01:29 (QMT)																	
17/06/2023 15:01:29 (AEST)		Proposed (1)															
17/06/2023 15:01:29 (AEST)		Account Holder Approved (37)															
17/06/2023 05:01:29 (QMT)																	
17/06/2023 14:25:33 (AEST)		Awaiting Account Holder Approval (X5)															
17/06/2023 04:25:33 (QMT)																	

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	

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 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
N/A						



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