



# **PUBLIC DISCLOSURE STATEMENT**

**AGL TELECOMMUNICATIONS & SOUTHERN  
PHONE COMPANY**

**PRODUCT CERTIFICATION  
TELECOMMUNICATIONS  
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><b>Signature here</b></p> 
	<p>Name of signatory Mike Goodburn          Position of signatory Acting GM Product &amp; Commercial          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	26,194 tCO <sub>2</sub> -e
CARBON OFFSETS USED	5% ACCUs, 95% VERs
RENEWABLE ELECTRICITY	N/A
CARBON ACCOUNT	Prepared by: Environmental Resources Management (ERM)
TECHNICAL ASSESSMENT	13/02/2026 (CY2024) Rob Rouwette, Environmental Resources Management (ERM) Next technical assessment due: CY2027

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## 2. CERTIFICATION INFORMATION

### Description of product certification

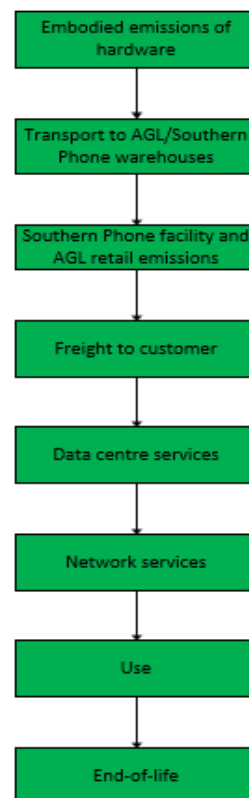
This public disclosure statement supports the carbon neutral product certification for the entirety of telecommunications services sold by AGL Telecommunications and Southern Phone Company. This includes the lifecycle assessment and quantification of Scope 1, 2 and 3 emissions.

The emissions reported here are for CY2024, which is the fourth 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.

'Telecommunications product' includes all telecommunications goods and services provided by AGL Telecommunications and Southern Phone Company, including internet services (nbn®, ADSL, Satellite, LBN Co, home phone services, modems and handsets) and mobile services (carriage service over either the Optus or Telstra mobile networks, mobile handsets and SIM cards).

- Functional unit: One '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. AGL Telecommunications and Southern Phone Company provide a Carbon Neutral Telecommunications product to all residential and small business customers, with no opt-in or customer eligibility requirements.



*Process map for Telecommunications Product*

- Offered as: Full coverage product
- Life cycle: The product is full coverage and uses a cradle to grave methodology.

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)<sup>1</sup>. AGL's operated generation accounted for nearly 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.

<sup>1</sup> 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.

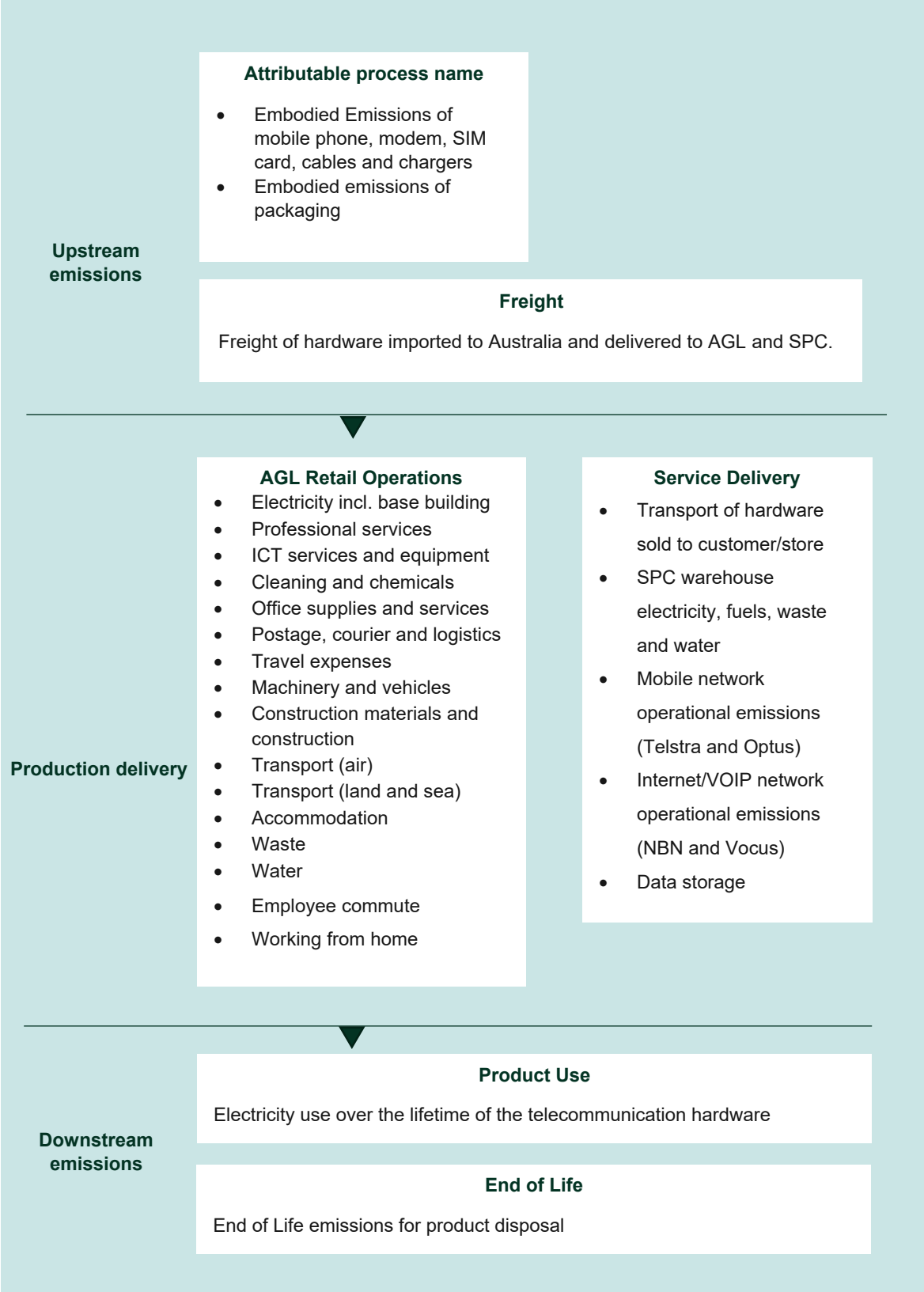
### Outside the emissions boundary

**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 following<sup>2</sup>:

- Close Loy Yang A Power Station by the end of FY35.<sup>3</sup>
- 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.<sup>4,5</sup>
- 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<sup>4,5</sup>
- 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.

Furthermore, AGL requires its suppliers to comply with AGL's Supplier Code of Conduct which outlines the minimum ESG standards that we expect from our suppliers. Suppliers are expected to identify, monitor and minimise emissions and energy consumption from their operations; and continuously improve their environmental performance. Includes an obligation to minimise environmental footprint and promoting environmental responsibility. Suppliers with 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.

<sup>2</sup> 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.

<sup>3</sup> 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.

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

<sup>5</sup> 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.

Our Internet plans provide customers with the ability to reduce offset their footprint through the Climate Active certification and as well as 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 new modem from us.

We introduced biodegradable satchel packs in 2020[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 <sub>2</sub> -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
Year 4:	CY2024	26,194	76.78

### Significant changes in emissions

Significant changes in emissions			
Attributable process	Previous year emissions (t CO <sub>2</sub> -e)	Current year emissions (t CO <sub>2</sub> -e)	Reason for change
Product Use	16,438.56	12,506.51	In CY2024, AGL sold a greater proportion of SIM card only plans over higher use-phase emissions products such as mobile phones and modems.

### 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.

Life cycle stage / Attributable process / Emission source	tCO <sub>2</sub> -e
Embodied emissions products and packaging	1,700.44
Freight (land and sea)	7.16
Network emissions	10,623.63
Data storage	62.60
Southern Phone (energy, fuel, waste and water)	643.77
AGL retail emissions	645.72
Product use	12,506.51
End of life	3.26
<b>Attributable emissions (tCO<sub>2</sub>-e)</b>	<b>26,194</b>

Product offset liability	
Emissions intensity per functional unit (kgCO <sub>2</sub> -e/SIO)	76.78
Emissions intensity per functional unit including uplift factors	N/A
Number of functional units covered by the certification (SIO)	341,160
<b>Total emissions (tCO<sub>2</sub>-e) to be offset</b>	<b>26,194</b>

## 6. CARBON OFFSETS

### Eligible offsets retirement summary

#### Offsets retired for Climate Active certification

This certification has taken an in-arrears offsetting approach. The total greenhouse gas emissions to offset is 26,194 tCO<sub>2</sub>e.

The total number of eligible offsets used in this report is 26,194. Of the total eligible offsets used, zero were previously banked and 26,194 were newly purchased and retired. Zero are remaining and have been banked for future use.

Type of offset unit	Quantity used for this reporting period	Percentage of total units used
Australian Carbon Credit Units (ACCUs)	1,310	5%
Verified Emissions Reductions (VERs)	24,884	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
GS10789 VPA2: Efficient and Clean Cooking for households in Kenya	VERs	GSF Registry	17/06/2025	<a href="#">GS1-1-KE-GS10791-16-2023-26382-66045-80940</a>	2023	14,896	0	0	14,896	57%
TASC Clean Cooking PoA – VPA 1 (Zambia)	VERs	GSF Registry	17/06/2025	<a href="#">GS1-1-ZM-GS11145-16-2023-25994-1-9987</a>	2023	9,987	0	0	9,987	38%
Byzantium Induced Regeneration of Native Forest Project	ACCUs	ANREU	17/06/2025	8,409,885,460 – 8,409,886,769 (Appendix A for transaction record)	2023-24	1,310	0	0	1,310	5%
TASC Clean Cooking PoA – VPA 1 (Zambia)	VERs	GSF Registry	13/02/2026	<a href="#">GS1-1-ZM-GS11145-16-2023-25994-16027-16027</a>	2023	1	0	0	1	0.004%
<b>Offset Totals:</b>						<b>26,194</b>	<b>0</b>	<b>0</b>	<b>26,194</b>	<b>100%</b>

## 7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

### Renewable Energy Certificate (REC) Summary

N/A

# APPENDIX A: ADDITIONAL INFORMATION

<b>Transaction ID</b>		AU42114	
<b>Current Status</b>		Completed (4)	
<b>Status Date</b>		17/06/2023 14:56:04 (AEST) 17/06/2023 04:56:04 (GMT)	
<b>Transaction Type</b>		Cancellation (4)	
<b>Transaction Initiator</b>		Leo, Ly Kheng	
<b>Transaction Approver</b>		Chen, Sinu	
<b>Comment</b> Retired on behalf of AGL and Southern Phone for CY2024 Telco Carbon Neutral Certification under Climate Active			
<b>Transferring Account</b>		<b>Acquiring Account</b>	
<b>Account Number</b>	AU-2600	<b>Account Number</b>	AU-1000
<b>Account Name</b>	AGL Hydro Partnership	<b>Account Name</b>	Australia Voluntary Cancellation Account
<b>Account Holder</b>	AGL HP1 Pty Limited	<b>Account Holder</b>	Commonwealth of Australia

Transaction Blocks													
Party	Type	Transaction Type	Original CP	Current CP	ESG Project ID	NGER Facility ID	NGER Facility Name	Safeguard	Kyoto Project #	Vintage	Expiry Date	Serial Range	Quantity
AGL	KACB	Voluntary ACCU Cancellation			<a href="#">ESG10006</a>					2022-24		6,400,883,460 - 6,400,886,700	1,239

Transaction Status History	
Status Date	Status Code
17/06/2023 14:56:04 (AEST) 17/06/2023 04:56:04 (GMT)	Completed (4)
17/06/2023 14:56:04 (AEST) 17/06/2023 04:56:04 (GMT)	Proposed (3)
17/06/2023 14:56:04 (AEST) 17/06/2023 04:56:04 (GMT)	Account Holder Approved (97)
17/06/2023 04:17:34 (AEST)	Awaiting Account Holder Approval (95)

## 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
Network Infrastructure embodied emissions	Y	N	N	N	N	<p><b>Size:</b> 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><b>Influence:</b> 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><b>Risk:</b> 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><b>Stakeholders:</b> Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for our product.</p> <p><b>Outsourcing:</b> We have not previously undertaken this activity within our emissions boundary and comparable products do not typically undertake this activity within their boundary.</p>



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