



PUBLIC DISCLOSURE STATEMENT

LUMO ENERGY OFFSET GAS PRODUCT

PRODUCT CERTIFICATION

FY2024-25

Australian Government

Climate Active Public Disclosure Statement



An Australian Government Initiative



NAME OF CERTIFIED ENTITY	Lumo Energy (SA) T/A Lumo Energy (Offset Gas Product)
REPORTING PERIOD	Financial year 1 July 2024 – 30 June 2025 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> <i>Signature here</i> Name of signatory Position of signatory Date



Australian Government

Department of Climate Change, Energy,
the Environment and Water

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Version 10.

1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	56 tCO ₂ -e
CARBON OFFSETS USED	100% ACCUs
RENEWABLE ELECTRICITY	N/A
CARBON ACCOUNT	Prepared by: Rennie Advisory
TECHNICAL ASSESSMENT	15 December 2025 Katherine Simmons, KREA Consulting Next technical assessment due: FY28

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2. CERTIFICATION INFORMATION

Description of product certification

This product certification is for gas sold under Lumo Energy's Offset Gas opt-in product.

- Functional unit: GJ of Offset Gas product sold
- Offered as: opt-in product
- Life cycle: cradle-to-grave. GHG emissions sources covered include those associated with:
 - Extraction, production, and distribution of natural gas,
 - Consumption of natural gas at the customer's premises (combustion), and
 - Offset Gas retailing activities.

Natural gas is purchased via supply contracts from various producers operating under different states and transmitted and distributed via various pipelines operated by pipeline operators.

The responsible entity for this product certification is Lumo Energy (SA) (ABN 61 114 356 697).

This Public Disclosure Statement includes information for FY2024-25 reporting period.

Description of business

Lumo Energy is 100% owned by Snowy Hydro Limited, which manages, and maintains the Snowy Mountains Hydro-electric Scheme. Snowy has been generating renewable energy since 1955 and the Snowy Scheme is one of the largest sources of renewable energy in Australia. Snowy Hydro is also building Snowy 2.0, the largest committed renewable energy project in Australia.

Lumo Energy offers electricity and gas to residential and business customers in South Australia and Victoria and partners. Over the last twelve years Lumo has won 11 Canstar Blue, Roy Morgan and Australian Reader's Digest Awards. Lumo Energy's electricity products are not certified.

Lumo Energy handles the customer contract sales and management of the Lumo Energy Offset Gas product.

GHG emissions associated with Offset Gas retailing activities have been calculated according to the proportion of FTEs involved in the retail of the product. These are offset under the Lumo Energy Organisation parent certification.

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.

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**).

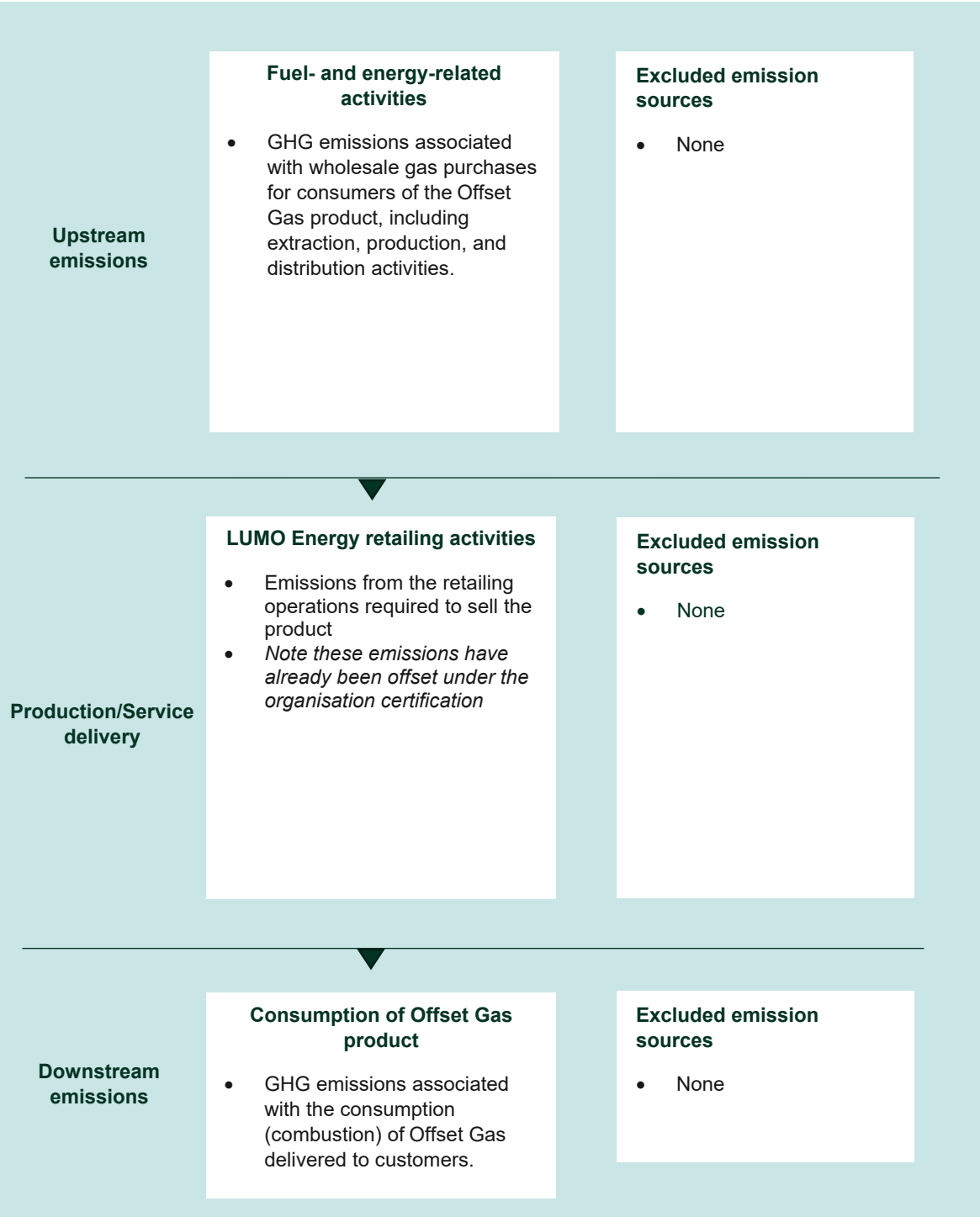
Outside the emissions boundary

Non-attributable emissions have been assessed as not attributable to a product or service. 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		Outside emission boundary
<u>Quantified</u> Emissions from the exploration and production of natural gas Transmission & distribution losses for natural gas Combustion of gas at customers' premises Emissions from retailing activities, including emissions from: • Transport (air) • Electricity • Machinery and vehicles • Postage, courier and freight • ICT services and equipment • Accommodation and facilities • Transport (land and sea) • Office equipment and supplies • Professional services • Outsourced customer support services • Refrigerants • Stationary energy • Waste • Water • Working from home	<u>Non-quantified</u> None	<u>Non-attributable</u> None
	<u>Excluded</u> None	

Product process diagram

Cradle-to-grave boundary



4.EMISSIONS REDUCTIONS

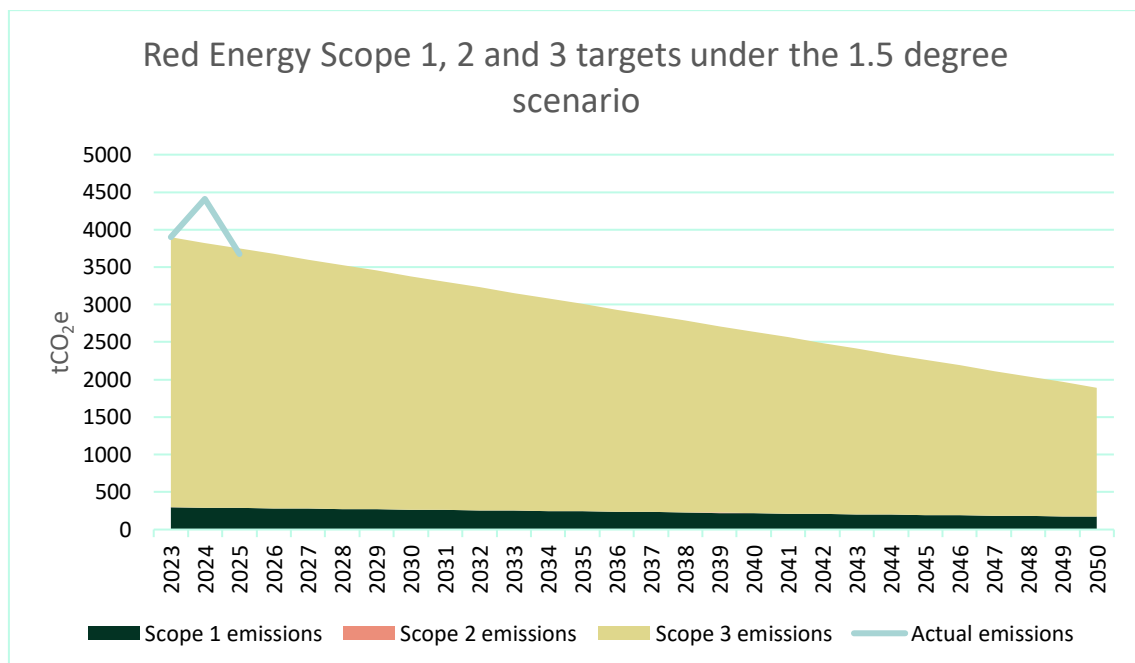
Emissions reduction strategy

As part of this commitment, we remain focused on delivering our long-term target to **reduce scope 1, 2 and 3 emissions by 42% by the end of the fiscal year 2050**, using FY22–23 as our base year. This strategy outlines our specific approaches to meet these targets.

This emissions reduction strategy extends to all certifications covered under the Red Energy parent certification.

In the interest of transparency, we have shown our progress to date. Year-on-year changes in emissions are generally influenced by business activity and growth, travel requirements, procurement patterns and updates in the measurement of emissions. The increase from FY23 to FY24 is due to business growth (more employees, more travel, increase in IT spend etc.), and improved accuracy of emissions measurements.

In FY25, total operational emissions **decreased by over 16% from FY24**, reflecting reductions across several emission sources. The most notable decreases occurred in transport (land and sea), professional services, ICT services and equipment, and office equipment and supplies, which contributed significantly to the overall reduction in emissions. Importantly, this decrease occurred despite increased product sales and FTE growth during the reporting year, demonstrating that operational efficiencies and improved emissions management had a material impact on overall results.



Emissions reduction actions

The actions below remain ongoing and continue to support emission reductions across Red Energy's operations.

Action item	Commencement date	Expected outcome	Details	FY24 to FY25 progress / contribution
Fleet transition to electric vehicles	Target: 2027	Elimination of scope 1 emissions from fleet.	Committed to replacing the entire vehicle fleet with electric vehicles by 2027.	N/A
Engaging with Red Energy suppliers	Ongoing	3-5% reduction in scope 3 emissions from suppliers	Asking suppliers to collaborate with Red Energy to reduce their carbon footprint.	Contributed to a reduction in supplier-related scope 3 emissions compared with FY24.
Promotion of video conferencing	Ongoing	5-7% reduction in scope 3 emissions from business travel	Promoting video conferencing to minimise travel.	Supported reductions in business travel emissions in FY25.
Flexible working arrangements	Ongoing	2-4% reduction in scope 3 emissions from commuting.	Encouraging flexible working arrangements to reduce employee commuting.	Helped reduce employee commuting emissions consistent with FY24.
Promotion of eComms for customers	Ongoing	1-2% reduction in scope 3 emissions	Encouraging customers to opt for electronic communications to reduce paper usage and associated emissions.	Contributed to reduced paper use and lower associated emissions.

The following initiatives have already been fully implemented and continue to contribute to reducing Red Energy's operational emissions.

Action item	Commencement date	Expected outcome	Details
Purchase of electric and hydrogen vehicles	Already implemented	8-12% reduction in scope 1 emissions	Purchased 5 electric and 2 hydrogen vehicles. Trialling EV chargers at the Bryant & May building.
100% GreenPower commitment	Already implemented	100% reduction in scope 2 emissions.	Committing to source 100% of electricity from GreenPower or similar renewable energy options.
LED Lighting at Bryant & May Office	Already implemented	Reduction in energy consumption	Replaced traditional lights with energy-efficient LED lighting at the Bryant & May office.
Paper-light policy	Already implemented	1-2% reduction in scope 3 emissions	Implemented a paper-light policy and encouraged digital work.
Installation of light sensors	Already implemented	Additional reduction in energy consumption	Equipped offices with light sensors for ambient light and auto shut-off meeting room lighting.

5.EMISSIONS SUMMARY

Emissions over time

Emissions since base year			
		Total tCO ₂ -e	Emissions intensity of the functional unit
Base year:	2022-23	0.93	0.06
Year 1:	2023-24	19.62	0.062
Year 2:	2024-25	55.91	0.062

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
Natural Gas SA (metro) (GJ)	19.62	55.91	Emissions increased due to higher volumes of Offset Gas sold to customers in South Australia during FY25. The underlying activity data shows an increase in gas consumption from 315.23 GJ in FY24 to 888.48 GJ in FY25, reflecting higher customer usage and uptake of the product

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

N/A

Emissions summary

This emissions summary represents attributable emissions from customers who have opted-in to the product.

No uplift factors were included in the total.

Life cycle stage	tCO ₂ -e	Product offset liability (tCO ₂ -e)
Upstream fuel- and energy-related activities	9.61	9.61
Production / service delivery (retailing)	0.39	0.00 ¹
Downstream consumption of Offset Gas product	46.30	46.30
Attributable emissions (tCO₂-e)	56.28	55.91

Electricity, water and waste emissions from the retailing component include emissions from the New Zealand office. The retailing component includes emissions from customer support services in Mumbai.

Product offset liability	
Emissions intensity per functional unit	0.062 tCO ₂ -e per GJ
Emissions intensity per functional unit including uplift factors	N/A
Number of functional units covered by the certification	898.48
Total emissions (tCO₂-e) to be offset	55.91

¹ Production/Service delivery (i.e. retailing) emissions are covered under Lumo Energy's organisational certification.

6. CARBON OFFSETS

Eligible offsets retirement summary

This certification takes an in-arrears offsetting approach.

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)	56	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
ERF101492 Inverness Human-Induced Regeneration Project	ACCU	ANREU	26/11/2025	8,333,855,408 - 8,333,858,407	2021-22	3000	2944	0	56	100.00%

Please note that the retailing emissions component of this certification has been offset under the Lumo Energy Organisation certification.

3000 ERF101492 offsets are used as follows: Red Energy Organisation (Parent) 1455; Red Energy Offset Gas Product - 486; TrueGreen Electricity Product 0; Lumo Energy organisation - 925; Lumo Energy Offset Gas Product - 56; Direct connect Organisation 78, there are 0 offsets banked for future use.

Co-benefits

Inverness Human-Induced Regeneration Project: This project establishes permanent native forests through assisted regeneration from in-situ seed sources (including rootstock and lignotubers) on land that was cleared of vegetation and where regrowth was suppressed for at least 10 years prior to the project having commenced.

The project has also created and protected habitat for native flora and fauna, provided infrastructure upgrades, and supported feral animal management.

7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) Summary

The following RECs have been surrendered to reduce electricity emissions under the market-based reporting method.

1. Large-scale Generation certificates (LGCs)*	N/A
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* LGCs in this table only include those surrendered voluntarily (including through PPA arrangements), and does not include those surrendered in relation to the LRET, GreenPower, and jurisdictional renewables.

Project supported by LGC purchase	Project location	Eligible unit type	Registry	Surrender date	Accreditation code	Certificate serial number	Generation year	Fuel source	Quantity (MWh)
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total LGCs surrendered this report and used in this report									N/A

APPENDIX A: ADDITIONAL INFORMATION

Transaction details

Completed

Transaction approved, all authorised representatives have been notified.

Transaction ID
80569000

Transaction type
Voluntary cancellation

Transferring account
AU-1507: Red Energy Pty Limited
RED ENERGY PTY LIMITED

Acquiring account
AU-1058: Australia Voluntary Cancellation Account
Commonwealth of Australia

Comments
Red Energy Voluntary surrender Nov25

Selected ACCUs

id	Vintage	Location	Serial range start	Serial range end	Category	Quantity
in-Induced eration of a...	2021-22	NSW	8,333,858,408	8,333,858,407	KACCU	3,000
in-Induced eration of a...	2021-22	NSW	8,333,500,566	8,333,502,244	KACCU	678
in-Induced eration of a...	2020-22	NSW	8,330,800,298	8,330,800,614	KACCU	1,217
						Total: 4,895
1						Items per page
						1 - 3 of 3 items

Transaction history

Action	Date and time	Authorised representative
Approved	26/11/2025 15:29 pm +11:00	Martin Eestay
Initiated	24/11/2025 9:00:31 am +11:00	David Fenton

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.

An uplift factor must be applied to account for emissions sources which are estimated to be material, but not practical to measure (such as no actual or projected data).

Relevant non-quantified emission sources	Justification reason
Not applicable	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.

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 (less than 1% of emissions)**.

If an emissions source is determined to be material (but does not have actual or projected data), it cannot be excluded and must be considered as a non-quantified emissions source.

Please provide justification regarding each excluded emissions source:

Emissions Source	No actual data	No projected data	Immaterial	Justification
Not applicable				

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						Justification
	Size	Influence	Risk	Stakeholders	Outsourcing	
Not applicable						

APPENDIX E: OPT-IN PRODUCT ACTION PLAN

Not applicable



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