

Energy Policy and Partnerships Section
Clean Energy Regulator
GPO Box 621 CANBERRA ACT 2601

Lodged Via email: CER-CERT@cer.gov.au

1 November 2021

**RE: APA Submission to Corporate Emissions Reduction Transparency report
Consultation**

Dear Sir or Madam,

Thank you for the opportunity to provide feedback on the Corporate Emissions Reduction Transparency (CERT) report as part of a second phase of consultation.

APA is an ASX listed owner, operator, and developer of energy infrastructure assets across Australia. Through a diverse portfolio of assets, we provide energy to customers in every state and territory on mainland Australia. As well as an extensive network of natural gas pipelines, we own or have interests in gas storage and generation facilities, electricity transmission networks, and over \$750 million in renewable generation.

We support the global transition to a lower carbon future and are actively supporting the energy transition taking place across Australia. To that end, we announced our own ambition of net zero operations emissions by 2050 earlier this year, with a plan to publish interim targets later this financial year. This work is supported by a Climate Change Management Framework; an enterprise wide transformation program to further embed consideration for our ambition and climate risk into business strategy, decision-making and processes as well as our Pathfinder Program to seek out opportunities to extend APA's core business through innovation, technology and new energy opportunities.

APA is committed to reporting principles of transparency, comparability and accountability and in line with the Taskforce for Climate Related Financial Disclosures. We support the intention of the Australian Government's CERT report and see it as aligning with our existing disclosure commitments. The CERT report also supports ease of comparability with other company's climate related performance.

We offer the following suggestions for consideration by the CER ahead of the CERT report pilot phase:

- Enable power generation intensity commitments with verification of progress at a portfolio level to be included. Verification of portfolio power generation intensity is possible through electricity sector emissions and generation data published by the CER.

- The CER to publish state based residual mix factors and rules related to large generation certificate (LGC) vintages to increase the accuracy and comparability of scope 2 emissions reporting using the market based method.
- In the CERT 'Company View' there is a "'units and certificates'" graph. LGCs are not considered an offset and as such it is suggested that this detail be presented in a separate graph.
- For stakeholder ease of reference, it is suggested that a section be included in the CERT report where links to company sustainability and other related information can be inserted. To minimise reporting burden it is important to draw on existing sources of relevant data and information wherever possible.

If you wish to discuss our submission in further detail, please contact APA's Manager Carbon and Climate, Andrew Dyer, on 0456 992 444 or andrew.dyer@apa.com.au.

Regards,

Megan Saussey

Megan Saussey
General Manager
Sustainability and Community