



EnergyAustralia
LIGHT THE WAY

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Climate Disclosure Unit
Market Conduct Division
Treasury
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CLIMATE-RELATED FINANCIAL DISCLOSURES – Second Consultation

EnergyAustralia (EA) welcomes the opportunity to comment on the Treasury's second consultation paper on Climate-related Financial Disclosures (June 2023). EA is one of Australia's largest energy companies with around 2.4 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. EA owns, contracts and operates a diversified energy generation portfolio that includes coal, gas, battery storage, demand response, solar and wind assets. Combined, these assets comprise circa 5,400MW of generation capacity.

EA is dedicated to building an energy system that lowers emissions and delivers secure, reliable and affordable energy to all households and businesses via both our existing generation fleet and our growing portfolio of lower emissions assets. We recognise the value of working with Aboriginal and Torres Strait Islander peoples as the traditional custodians of this land in achieving this. We, therefore, acknowledge and respect their continued connection to all aspects of Country.

EA applauds Treasury's progress in developing standardised and internationally-aligned disclosure framework for climate-related financial reporting in Australia. In general, EA supports the approach outlined in the second consultation paper. In addition, EA has had the opportunity to review and provide comment on the Australian Energy Council submission to the second consultation and supports that submission where it is applicable to the activities of EA, in particular the discussion in relation to NGER data.

As such, EA does not propose to provide additional substantive comments, but for completeness, a number of matters are noted below that still remain subject to resolution, however, it is anticipated that most, if not all of these matters, will be the subject of the further consultation to be undertaken by the Australian Accounting Standards Board (AASB) or on the exposure draft of the legislation.

The remaining matters of relevance to EA are:

- EA prepares its annual financial reports on a group basis utilising the arrangements under the *ASIC Corporations (Wholly-owned Companies) Instrument 2016/785*. It will be important to confirm that these arrangements will also apply in the context of climate-related financial disclosures;
- EA undertakes its annual financial reports on a calendar year financial year basis in alignment with its parent company CLP Holdings Ltd, listed in Hong Kong. It

will be important to confirm the point in time at which the reporting requirements will commence, and how they will operate, for companies that report in a timeframe different to the standard Australian financial year. We understand this is a concern for a number of organisations; and

- We note it is proposed that the climate disclosures are included in a company's annual financial reports. As an unlisted company, as the consultation paper notes, these can be accessed through the ASIC register for a fee. However, it is unclear if this is considered to be sufficient to make the disclosures publicly available, and therefore clarity is sought on this matter. In addition, we support allowing entities that report some information in a separate report (such as a Climate Transition Action Plan or similar) to cross reference to that information in its annual disclosures.

Should you have any questions on this submission, please contact me on [REDACTED]
[REDACTED]

Yours sincerely,

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Sustainability Strategy Principal