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ACCU project and contract register improvements

AGL Energy (**AGL**) welcomes the opportunity to provide feedback to the Clean Energy Regulator (**CER**)'s Consultation paper: Improvements to the Australian Carbon Credit Unit (ACCU) Scheme project and contract register (**Consultation Paper**).

AGL acknowledges the important role of the ACCU Scheme in supporting Australia's legislated emissions reduction targets of 43 per cent below 2005 levels by 2030, 62-70 per cent below 2005 levels by 2035, and net zero by 2050. Consistent with best-practice climate policy, direct emissions reductions should remain the primary focus and take precedence over offsetting. However, ACCUs, together with other units that represent abatement or emissions reductions efforts¹, will be important for addressing residual emissions that cannot be avoided or reduced, and therefore are an integral part of reaching net zero commitments.

AGL has provided feedback to several consultations on the ACCU Scheme, supporting publication of additional information on methodologies, projects and certificates to improve scheme transparency and integrity to instil confidence and trust in the scheme and help customers make informed decisions around certificate purchases². We strongly support the CER's intent to improve the ACCU Scheme project and contract register (**the register**) and ensure that data is transparent, accessible and useful to all stakeholders.

Outlined below are AGL's key views on proposed changes in the Consultation Paper and recommendations to enhance the register's transparency, accessibility, and utility for stakeholders.

Register data structure

AGL supports improvements to the register's data structure to enable robust and meaningful analysis of carbon project information. However, transitioning to a new relational data model may require additional system development and resourcing, which could pose challenges for some organisations. To ensure continuity and minimise disruption, we suggest that the CER continue publishing the existing flat file alongside the proposed relational data model to allow organisations with established automated processes to maintain their current workflows while adapting to the new format at their own pace.

Geospatial records format

AGL supports the publication of geospatial files, including carbon estimation area (CEA) records, in SHP format. However, we do not believe that the file format should be limited only to SHP as various stakeholders may have different requirements. To accommodate diverse stakeholder needs and promote interoperability, we recommend that the CER also provide files in KML format in addition to SHP.

¹ For example, small-scale technology certificates (STCs), large-scale generation certificates (LGCs), energy savings certificates (ESCs), Victorian energy efficiency certificates (VEECs)

² See: [AGL's submission](#) to the 2023 ACCU Review consultation



Additional publication of information

Enhancing transparency and enabling informed decision-making are critical to the integrity of the ACCU scheme. We welcome changes that advance these objectives.

Publication of monthly ACCU issuance is a positive step toward greater market transparency. While this information can currently be derived by comparing register versions, providing explicit monthly ACCU totals will simplify access and improve clarity for all stakeholders.

We strongly support the proposed provision of additional tabular data such as total area of project area (ha) and total CEA (ha) within the register. Although this information is publicly accessible through existing KML files, extracting it requires manual processing using geospatial tools, which is time-consuming and risks inconsistent or inaccurate calculations. Embedding this data directly in the register will reduce administrative burden and enhance transparency.

Given the dynamic nature of project stratifications, we recommend introducing a mechanism to track changes in CEAs or project areas between register updates. This could include a dedicated column or a change log detailing when CEAs were added, removed, or paused; the date of change; and the reason (e.g., gateway check, reversal event). Such transparency would strengthen confidence in the scheme and support robust analysis.

AGL looks forward to these enhancements and remains committed to supporting initiatives that strengthen the accessibility and integrity of the register.

Should you have any questions in relation to this submission, please contact Casey Barkla-Jones at cbarkla@agl.com.au.

Yours sincerely,

AGL Energy

About AGL

At AGL, we believe energy makes life better and are passionate about powering Australian life. Proudly Australian since 1837, AGL delivers around 4.6 million³ gas, electricity, and telecommunications services to our residential, small and large business, and wholesale customers across Australia. AGL operates Australia's largest private electricity generation portfolio within the National Electricity Market, comprising coal and gas-fired generation, renewable energy sources such as wind and hydro, and batteries and other firming and storage technology. We are building on our history as one of Australia's leading private investors in renewable energy to be a leader in the transition to a lower emissions and smart energy future in line with the goals of our Climate Transition Action Plan. We'll continue to innovate in energy and other services to enhance the way Australians live, move and work.

³ Refer to AGL's [ESG Data Centre FY25](#)