



Comprehensive Investment and Policy Plan

Rencana Investasi dan Kebijakan Komprehensif

Public Feedback Compilation

Kumpulan Umpan Balik Publik

1st – 14th November 2023

Context:

The JETP Secretariat received submissions from **33 individuals and organizations** during the public consultation period held from 1st to 14th of November. Below is the **list of disclosed comments that we received during this period**. Individuals and organizations that have opted against disclosure have not been included in the list.

Please note that some of the feedback aligned with the scope of the current CIPP and JETP principles may be incorporated in the 2023 CIPP. However, feedback that require deeper technical analysis will be considered for the next update of the CIPP. More details will be shared on the JETP website after we have fully examined and addressed each comment **by the 28th November 2023**.

Feedback to the CIPP and general enquiries about JETP Indonesia **shall remain open to the public after the launch of the 2023 version of the CIPP**. All feedback received will be addressed by the JETP Secretariat team periodically and will be considered for the 2024 version of the CIPP.

If you have any further questions or would like more detailed information on specific points, please feel free to reach out to the Secretariat directly or via the JETP website jetp-id.org.

Konteks:

Sekretariat JETP telah menerima masukan dari **33 individu dan organisasi** selama periode konsultasi publik yang telah berlangsung dari tanggal 1 hingga 14 November. **Daftar komentar terbuka yang kami terima selama periode ini** terlampir dalam dokumen ini. Beberapa komentar yang disampaikan sengaja tidak kami ikutsertakan dalam daftar ini karena disampaikan oleh individu dan organisasi yang menolak untuk dipublikasikan.

Sebagai catatan, beberapa komentar yang sudah kami terima yang bersifat selaras dengan ruang lingkup dokumen CIPP tahun ini dan sesuai dengan prinsip-prinsip JETP dapat kami ikutsertakan dalam dokumen CIPP versi 2023. Namun komentar yang membutuhkan analisis teknis yang lebih mendalam akan kami pertimbangkan untuk proses pemutakhiran dokumen CIPP di tahun mendatang. Kami akan sertakan rincian tanggapan atas setiap komentar di website JETP **pada tanggal 28 November 2023** setelah semua komentar telah kami telaah dan tanggapi.

Publik dapat terus menyediakan **umpan balik bagi dokumen CIPP dan komentar umum tentang JETP Indonesia setelah peluncuran CIPP versi 2023**. Masukan ini akan ditanggapi oleh tim Sekretariat JETP secara berkala dan akan dipertimbangkan untuk CIPP versi 2024.

Jika Anda memiliki pertanyaan lebih lanjut atau menginginkan informasi lebih rinci mengenai poin-poin tertentu, silakan menghubungi Sekretariat JETP secara langsung melalui situs website jetp-id.org.

No	Name	Institution	Content	Link*
1	Anonymous	Anonymous	<p>General/overall comments and remarks: Perlunya menambahkan glosarium atau penjelasan singkat untuk definisi teknis di dalam dokumen CIPP. Hal ini mengingat tidak semua stakeholder seperti kelompok perempuan mengikuti perdebatan-perdebatan-perdebatan teknis mengenai energi. Begitu pula sebaliknya, investor dan yang terlibat dalam energi mungkin tidak mengetahui definisi istilah-istilah yang dipakai dalam sektor sosial seperti kesetaraan gender, inklusi, dan partisipasi bermakna.</p> <p>Chapter 1 : Executive Summary comments and remarks: 1. Justice di dalam rencana transisi energi sangat penting, namun di dalam prinsip inti JETP tidak mencantumkan prinsip justice atau inclusiveness yang ada pada bab 6 dalam Just Transition Framework.</p> <p>2. Pada hal 1:</p> <ul style="list-style-type: none"> • Keanggotaan Working Group (WG): Terbatasnya representasi pemerintah daerah (terutama daerah yang menjadi target prioritas pensiun dini batu bara) dalam salah satu anggota tim penyusun ataupun pihak prioritas pelibatan dalam konsultasi erat, terlebih dalam keanggotaan WG Policy. <p>Chapter 2 : CIPP Overview comments and remarks: 1. Pada halaman 10, bab 2.3 tentang CIPP Objectives and Guiding</p> <ul style="list-style-type: none"> • Terkait WG, khususnya untuk Just Transition Working Group perlu memberikan ruang untuk CSO lokal terutama organisasi perempuan (women’s organisation) atau organisasi pembela hak perempuan (women rights organizations/WROs) untuk dapat terlibat dalam proyek ini karena prinsip yang diusung tak hanya mengenai human rights namun gender equality (bab 6). <p>Chapter 4 : Impact on Indonesia’s Economy: A Case for Energy Transition comments and remarks: 2. Pada halaman 29, bab 4.3 Job Creation and Employment Impacts.</p> <ul style="list-style-type: none"> • Bab ini sudah baik membahas soal jenis pekerjaan yang hilang dan berganti serta perlindungan sosial yang diperlukan dan akan disiapkan, namun pembahasan mengenai dampak sosial ekonomi terhadap sektor informal tidak ditemukan. Sektor informal justru melibatkan masyarakat yang paling rentan karena hilangnya mata pencaharian dan tidak termasuk pada kelompok yang dapat menerima perlindungan sosial, spt supir truk pengangkut batu <p>Chapter 6 : Ensuring a Just Energy Transition comments and remarks: 1. Pentingnya konsultasi publik yang inklusif dan partisipatif beserta akses informasi yang bisa diakses.</p> <ul style="list-style-type: none"> • Penting adanya strategi untuk menjangkau masyarakat akar rumput khususnya masyarakat yang berpotensi terdampak dari proyek-proyek energi, mulai dari perencanaan hingga penilaian pelaksanaan proyek. Aspek penting dalam partisipasi masyarakat adalah kapasitas masyarakat terdampak dan yang berpotensi terdampak untuk memahami proyek transisi energi beserta risiko- 	

		<p>risikonya.</p> <p>Chapter 7 : Financing the Just Energy Transition comments and remarks: Untuk menciptakan keadilan ekonomi di tingkat tapak/komunitas, dukungan hibah dapat digunakan untuk beberapa hal berikut:</p> <ul style="list-style-type: none"> • Gender budget tagging untuk kelompok perempuan, penyandang disabilitas, dan kelompok rentan lainnya di tingkat lokasi. • Proporsi pembiayaan transisi energi untuk pengembangan energi terbarukan berbasis komunitas. • Proyek transisi energi menggunakan model kepemilikan kolektif dengan komunitas. • Sumber energi mengutamakan komoditas lokal. <p>Chapter 8 : Enabling Policies for JETP Portfolio comments and remarks: 1. Adanya Peraturan Menteri ESDM yang mengatur pengarusutamaan GEDSI serta teknis operasionalisasinya dalam agenda transisi energi untuk memastikan dan meningkatkan kepatuhan para stakeholder di terkait dalam pelaksanaan investment dan policy plan. 2. Dikeluarkannya surat keputusan bersama lintas kementerian dalam pengarusutamaan GEDSI di sektor transisi energi untuk memperkuat komitmen lembaga pemerintah atau pihak terkait lainnya secara holistik.</p> <p>Chapter 9 : JETP Implementation and Governance comments and remarks: 1. Pada halaman 238, bab 9.3 JETP Monitoring and Evaluation Framework.</p> <ul style="list-style-type: none"> • Belum ada indikator dan belum ada target minimal yang ditentukan untuk aspek gender dan inklusi JETP. • Data terpilah gender, disabilitas, dan kelompok rentan lainnya perlu dibuat wajib. <p>3. Selain konsultasi publik yang direncanakan secara reguler, diharapkan Sekretariat juga dapat menyediakan akses informasi dimana masyarakat bisa memonitor secara langsung di kanal publik.</p> <p>Chapter 10 : Appendix comments and remarks: Untuk Kepmenkomarves No 144 Tahun 2023 apakah sudah tersedia di kanal kementerian/JETP? Karena kami coba cari dan ingin unduh via google tidak ditemukan. Sebagai bahan rujukan untuk internalisasi GEDSI pada transisi energi berkeadilan, dapat merujuk pada dokumen ini (PWYP Indonesia, 2023) https://pwypindonesia.org/en/mainstreaming-gender-equality-disability-and-social-inclusion-gedsi-in-indonesias-just-energy-transition-2/</p>	
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2	Akmaluddin Rachim	PUSHEP	<p>General/overall comments and remarks: Pelaksanaan transisi energi mutlak dilakukan meskipun tanpa adanya JETP. JETP hanya salah satu upaya dari hal yang lebih esensial, yaitu transisi energi. Pendanaan dan pembiayaan transisi energi perlu dasar hukum yang lebih kuat, minimal setingkat peraturan pemerintah atau peraturan presiden.</p> <p>Pelaksanaan transisi energi dengan lima fokus areanya tidak bisa hanya didasarkan pada Perpres 112/2022 saja. Apalagi JETP ini sangat terkait prinsip keadilan.</p> <p>General/overall comments and remarks: Sekretariat JETP perlu mengadakan satu wadah utk tugas pemantauan dan evaluasi yang diisi oleh CSO agar pelaksanaan transisi energi mencapai rasa keadilan masyarakat. Termasuk utk mengetahui agar ada mekanisme kepatuhan terhadap regulasi/kebijakan.</p> <p>Sekretariat JETP perlu mendorong agar peta jalan transisi energi yg tertuang dlm CIPP jg diakomodasi dalam RUU EBET. Pembahasan terakhir, peta jalan tsb msh belum dirampungkan, namun usulan terkait transisi energi berkeadilan sdh coba diakomodasi.</p>	
3	Anonymous	Anonymous	N/A**	Link 3
4	Anissa Suharsono	International Institute for Sustainable Development (IISD)	General/overall comments and remarks: Full comments attached as PDF.	Link 4
5	Anonymous	Anonymous	N/A**	Link 5
6	Bambang Bayu Adji	IKPLN	N/A**	Link 6
7	Anonymous	Anonymous	General/overall comments and remarks: Dokumen CIPP, melalui analisis terbatas, ditemukan tidak memenuhi prinsip-prinsip dasar keadilan yang diadaptasi dari prinsip nilai Bersihkan Indonesia. Rekomendasi dan data selengkapnya dapat dilihat di attachment di bawah.	Link 7
8	Bhima Yudhistira	CELIOS	N/A**	Link 8
9	Anonymous	Anonymous	N/A**	Link 9

10	Brian McFeeters	US-ASEAN Business Council	<p>General/overall comments and remarks: My overall comment after reading the executive summary and parts of the next chapters is that the report provides little information on what can actually be achieved with the \$20 billion that the IGP and GFANZ pledged, on behalf of the G7. This is the highest value project of its kind, so far. And yet a few paragraphs into the Executive Summary we read that Indonesia’s plan will require several multiples of \$20 billion.</p> <p>Chapter 1 : Executive Summary comments and remarks: My request for the Executive Summary is to have a clear explanation, maybe a page or two, that explains what can be achieved with the \$20 billion, pledged but not yet in hand. The report as it is paints a picture of so many financial requirements—and note this is only for on grid, not captive—that an observer might think it’s just not achievable. Show me what \$20 billion can do. Let’s do that and then aim for more.</p>	
11	Anonymous	Anonymous	<p>General/overall comments and remarks: The inclusion of INTEGRITY checks is crucial across various listings, whether in the:</p> <ol style="list-style-type: none"> 1. PLN Priority list 2. JETP Investment Focus Area (IFA) 3. RUPTPL <p>it is essential to implement a thorough three-point check system. Plese see our detailed comments and remarks on the attached PDF.</p> <p>Chapter 1 : Executive Summary comments and remarks: Plese see our detailed comments and remarks on the attached PDF.</p> <p>Chapter 2 : CIPP Overview comments and remarks: Plese see our detailed comments and remarks on the attached PDF.</p> <p>Chapter 3 : Achieving Decarbonization Vision of Indonesia Through JETP comments and remarks: No further comments on this chapter.</p> <p>Chapter 4 : Impact on Indonesia’s Economy: A Case for Energy Transition comments and remarks: Plese see our detailed comments and remarks on the attached PDF.</p> <p>Chapter 5 : JETP Pathway and Portfolio of Programs comments and remarks: Plese see our detailed comments and remarks on the attached PDF.</p> <p>Chapter 6 : Ensuring a Just Energy Transition comments and remarks: Plese see our detailed comments and remarks on the attached PDF.</p> <p>Chapter 7 : Financing the Just Energy Transition comments and remarks: Plese see our detailed comments and remarks on the attached PDF.</p> <p>Chapter 8 : Enabling Policies for JETP Portfolio comments and remarks: Plese see our detailed comments and remarks on the attached PDF.</p> <p>Chapter 9 : JETP Implementation and Governance comments and remarks: No further comments</p>	Link 11

			<p>on this chapter.</p>	
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12	David Sterling	Reactive Technologies	<p>General/overall comments and remarks: Indonesia has set ambitious targets for the transition to higher renewables in the market. Comments:</p> <ol style="list-style-type: none"> 1) There in no transition without transmission and transmission needs tremendous change to both connect renewables and maintain grid stability and security with low inertia. 2) As more countries around the world are transitioning to renewable energy there are increases in costs and delays in supply of both renewable generation products and products for transmission augmentation. <p>Chapter 1 : Executive Summary comments and remarks: 44% renewable energy by 2030 is a challenge with today's supply chain due to high demand. US\$94.9b for the five IFAs, with US\$19.7b on Transmission (assuming includes synchronous condensers, batteries etc.). Spending <0.004% of the US\$19.7b on measuring inertia will provide information for improved investment decision.</p> <p>Chapter 2 : CIPP Overview comments and remarks: We agree with the US\$20b being insufficient to fund such an ambitious plan. the US\$19.7b is closer to the mark and we recommend measuring inertia early to understand real inertia needs and avoid overspending. This way Indonesia will avoid the same mistakes as the earlier countries investing in renewables.</p> <p>Chapter 3 : Achieving Decarbonization Vision of Indonesia Through JETP comments and remarks: We acknowledge that CO2 emissions per capita in Indonesia are well below the global average, and applaud that Indonesia is committing to increasing renewables. This is an impressive commitment given that Indonesia is a large thermal coal producer and self-sufficient with low-cost coal. As CFPP are being closed down it is important to measure inertia in the transmission network.</p> <p>Chapter 4 : Impact on Indonesia's Economy: A Case for Energy Transition comments and remarks: Indonesia seems to see the transition to renewable energy as an opportunity and not a threat to the economy. With a strong mining and mineral processing industry, in particular with nickel and other commodities required to produce renewable assets, Indonesia is well placed to take advantage of the transition.</p> <p>Chapter 5 : JETP Pathway and Portfolio of Programs comments and remarks: Indonesia should be aware there is currently a 30-month procurement time to get synchronous condensers. Understanding inertia to determine how many and where the synchronous condensers should be located can only be accurately determined by measuring inertia.</p> <p>Chapter 6 : Ensuring a Just Energy Transition comments and remarks: Energy security is mentioned as part of the Energy trilemma. However, I don't think sufficient thought has been put into dealing with network security with increased renewables. In particular the issues that are likely to occur around inertia, system strength, and oscillations in the grid. This includes measuring the three items and building an infrastructure to counter the side effects of increased renewables.</p>
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13	DDP Indonesia	IPB, ITB, IDDDRI	<p>General/overall comments and remarks: Due to space/word count issues, the full submission is attached.</p>	Link 13

14	Anonymous	Anonymous	<p>General/overall comments and remarks: While the CIPP articulates ambitious goals, there are concerns about the non-binding nature, which may impact long-term commitment and legal enforceability. For instance, the 44% renewable goal diverges from the targets set in existing regulations. This highlights the importance of synchronization of policy and legal frameworks for efficient climate action. Enhancing clarity on the "just" aspect within the document could further strengthen its overall impact and effectiveness.</p> <p>Chapter 1 : Executive Summary comments and remarks: The CIPP lacks clarity on how key principles in Chapter 1 relate to those in Chapter 6. The absence of this explanation creates potential inconsistencies. Additionally, the CIPP falls short in offering guidance on the incorporation of these principles into legal instruments, thereby jeopardizing their potentially non-binding nature. To enhance enforceability, it is recommended to incorporate these principles into the Bill on New and Renewable Energy (RUU EBET) or other legal instruments.</p> <p>Chapter 2 : CIPP Overview comments and remarks: Legal certainty holds paramount importance for a successful energy transition. The CIPP, being a guiding document, ideally should be of a permanent nature or at least have a clearly defined period of application to prevent disruptions in legal instruments and regulations. Risks associated with a lack of permanence include legal ambiguity, accountability concerns, and potential issues related to stakeholder participation.</p> <p>Chapter 3 : Achieving Decarbonization Vision of Indonesia Through JETP comments and remarks: "Just" aspect of Just Energy Transition has not been analyzed at all in this chapter. Considering it is a central part of JETP, this chapter should have a comprehensive explanation about the background of the "just" aspect in just energy transition, its urgency, and what the international communities as well as government of Indonesia have already done to accommodate that aspect. Additionally, this chapter is too focused on electricity generation only and left out other sub-sectors of energy.</p> <p>Chapter 4 : Impact on Indonesia's Economy: A Case for Energy Transition comments and remarks: The \$20 billion financing commitment within the JETP is a significant step, but achieving net-zero emissions requires a substantially larger pool of resources. Long-term economic growth, tied to enhanced competitiveness, hinges on sustained and strategic efforts. While the concessional loans received offer advantages, they also involve long-term financial obligations. Hence, this chapter on the impacts on Indonesia's economy should be more thoroughly substantiated and supported.</p> <p>Chapter 5 : JETP Pathway and Portfolio of Programs comments and remarks: Legal regulation is crucial for the success of JETP. Key areas requiring legal attention include defining authority and procedures to ensure coordinated governance, establishing guidelines for project funding selection based on transparent and objective criteria, enforcing transparency and accountability measures, and implementing a MRV system for project outcomes. A robust legal framework is essential for</p>	Link 14
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		<p>effective program management, decision-making, and policy refinement.</p> <p>Chapter 6 : Ensuring a Just Energy Transition comments and remarks: The definition of Just Energy Transition needs to be refined as the current emphasis may lead to misinterpretations. Additionally, there is a need for enhancement to the energy trilemma in order to align more comprehensively with the goals of the JETP. A thorough revision of the JETP is also warranted to address existing shortcomings and provide clearer guidance for the effective implementation of JETP.</p> <p>Chapter 7 : Financing the Just Energy Transition comments and remarks: JETP's funding, largely reliant on concessional loans (97.5%), raises climate justice concerns. Advanced nations' disproportionate emphasis on loans over grants (2.5%) suggests a potential entanglement agenda. Indonesia must scrutinize and advocate for a more balanced financial structure to prevent long-term implications of indebting and compromising autonomy.</p> <p>Chapter 8 : Enabling Policies for JETP Portfolio comments and remarks: Several legal concerns arise in this chapter. Crucial areas of law, like employment law, haven't been proposed for modification or discussion. Furthermore, some CIPP recommendations in this section may disadvantage the government, and changes in accordance with this chapter could potentially lead to adverse impacts in the future.</p> <p>Chapter 9 : JETP Implementation and Governance comments and remarks: The JETP Governance Structure lacks a clear legal foundation. The absence of legal underpinning raises concerns about its authority and long-term sustainability. Additionally, the involvement of external actors in decision-making processes is unique and unregulated. The Task Force Steering Committee composition is exclusively governmental.</p> <p>Chapter 10 : Appendix comments and remarks: Further and in-depth elaboration on feedback can be found in the document attached and has been structured according to the CIPP portal for ease of read.</p>	
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15	Eka Satria	Apindo	<p>General/overall comments and remarks: Thank you for the draft CIPP document. However, several consideration may be considered to finalize the document such as:</p> <ol style="list-style-type: none"> 1. Ensure long-term financial stability for broader sets of stakeholders beyond PLN. 2. Include transition plan for captive and off-grid power plant. 3. Highlight a roadmap for SMEs. 4. Propose feed-in tariff mechanisms. 5. Implement power wheeling scheme. 6. Improve PPA terms. 7. Implement Carbon sink technology. 8. Specified incentive for RE supply chain. <p>Chapter 1 : Executive Summary comments and remarks: Proposed changes / addition:</p> <ol style="list-style-type: none"> 1. Add “Maintaining long-term financial stability for IPPs and other major stakeholders” as part of the guiding principles. 2. Detailed plan for the captive power plants and off-grid systems. 3. Incorporate energy efficiency and other decarbonization technologies (Carbon sink). 4. Add explicit policies or support for micro, small, and medium enterprises (MSME) programs such as solar rooftop, PV development in remote area where demand is low, etc. <p>Chapter 2 : CIPP Overview comments and remarks: Proposed changes / addition:</p> <ul style="list-style-type: none"> - To add point around “identifying potential instruments, incentives and policy interventions to ensure the long-term financial sustainability of IPPs” as part of the JETP priority areas - To add detailed plan to capture captive projects / off-grid systems in this version to ensure a more comprehensive coverage <p>Chapter 3 : Achieving Decarbonization Vision of Indonesia Through JETP comments and remarks:</p> <p>Chapter 4 : Impact on Indonesia’s Economy: A Case for Energy Transition comments and remarks:</p> <p>Proposed changes / addition:</p> <ul style="list-style-type: none"> o To integrate Carbon Sink technology, including CCUS, as part of the energy transition plan. Embracing CCUS demonstrates our commitment to striking a balance between leveraging indigenous resources and advancing environmentally responsible practices and fostering a future energy framework. <p>Chapter 5 : JETP Pathway and Portfolio of Programs comments and remarks: Proposed changes / addition:</p> <ul style="list-style-type: none"> o Reassess the top-priority projects considering following criteria: FID status, projects which are already listed in RUPTL, and part of the priority projects for PLN & ESDM o Detail out incentives to support infrastructure on renewable energy value chain localization, 	Link 15
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			<p>particularly on Solar value chain – for example: land grants from the government, Tax holiday and incentives and expedited regulatory process for land acquisition, AMDAL, other business licenses.</p> <p>Chapter 6 : Ensuring a Just Energy Transition comments and remarks: Proposed changes / addition:</p> <ul style="list-style-type: none"> o To include detailed workforce implications for the Just Energy Transition program – including new capabilities / skills to be prioritized and plan to upskill and reskill current workforce. <p>Chapter 7 : Financing the Just Energy Transition comments and remarks:</p> <p>Chapter 8 : Enabling Policies for JETP Portfolio comments and remarks: Proposed changes / addition:</p> <ul style="list-style-type: none"> o To outline the potential subsidy shifts from coal to renewables to enable level playing field. o To Implement a power wheeling scheme to enable the diversification of electricity sources to the customers and enhance the competition between power providers which will benefit the end customers. o To define fair allocation of the renewable energy certificate ownership in the PPA. o To propose the Feed in Tariff mechanisms to improve the project economics of RE. <p>Chapter 9 : JETP Implementation and Governance comments and remarks:</p> <p>Chapter 10 : Appendix comments and remarks: To add other projects on top of current priority project list to be considered such as:</p> <ol style="list-style-type: none"> 1) PLTS Bali which stated 25MW in CIPP should be revised to 50MW 2) PLTP Bonjol development 3) PLTA Kalimantan 4) PLTB Sumbawa 5) Current active smelters and mining projects required energi transition supports 6) Roof top projects done by MSME 7) Energy efficient projects. 	
16	Elis Nurhayati	Magister of Public Policy specializing in Climate Change,	<p>General/overall comments and remarks: More permanent legislation or legal instruments such as law/regulation, or MoU, are preferred in order to provide a more robust legal foundation for JETP. Right now, it may not be strong enough to ensure the realization of just energy transition in Indonesia.</p>	<p>Link 16</p>

		Faculty of Social Sciences, Universitas Islam Internasional Indonesia		
17	Anonymous	Anonymous	General/overall comments and remarks: Feedback provided in the attached doc due to the character limit in the form.	Link 17
18	Anonymous	Anonymous	<p>General/overall comments and remarks: appreciates that this draft document was published and welcomes the opportunity to provide public comments. Although this version of CIPP is only focused on the on-grid power, it is already a good starting point to be expanded to captive power (off-grid power plants) and the broader industry decarbonization effort.</p> <p>Chapter 3 : Achieving Decarbonization Vision of Indonesia Through JETP comments and remarks: Industry is a large user of coal and other fossil fuels and the second major source of CO2 emissions after the power sector. We believe our recommendations from the implementation of "Framework for industry's net-zero transition" in Indonesia could support these long-term climate plans as well as Indonesia's newly established Indonesia JETP secretariat mandate to reduce dependence on coal use and expand its scope to go beyond the power system transformation to include industry decarbonization.</p> <p>Chapter 5 : JETP Pathway and Portfolio of Programs comments and remarks: , OJK, and ESDM will analyze the need assessment of the country's development of Energy Saving Insurance (ESI). OJK also request to review and update the financial institution's Energy Efficiency (EE guidebook). ESI and EE guidebook works will be part of the collaboration between OJK-ESDM and OECD under secondees (person on loan program). We believe our recommendations could support the JETP Secretariat, particularly from the financial perspective of energy efficiency.</p> <p>Chapter 7 : Financing the Just Energy Transition comments and remarks: The and OJK convening FGDs on Transition Finance (TF) in Indonesia. The topics include (1) Introduction to the Guidance on TF ; (2) Transition of coal-based economies; (3) Transition planning at the corporate level. And (4) TF instruments and credibility criteria in the coal sector. We believe our summary of recommendations of the FGD could contribute to the OJK's TF program and provide insight for the JETP secretariat from the TF perspective.</p> <p>Chapter 8 : Enabling Policies for JETP Portfolio comments and remarks: industry framework implementation will prioritise better enabling investment conditions, including sectoral decarbonisation roadmaps, enhanced regulations, research and development strategies,</p>	Link 18

			<p>monitoring, reporting and verification systems, derisking instruments, and innovative business models to provide confidence to invest in low-carbon projects. Public finance in emerging markets is scarce and there are broader SDGs priorities, thus strengthening enabling conditions will be key.</p> <p>Chapter 9 : JETP Implementation and Governance comments and remarks: The Programme is discussing a MEMR secondment program to foster human capital development and knowledge sharing on clean energy finance and investment for MEMR officials, including clean energy finance and the implication of critical raw minerals for financing clean energy transition, and provide international exposure, capacity building and networking opportunities. We believe that works under MEMR's secondment programme can enrich the analysis of the JETP Secretariat.</p> <p>Chapter 10 : Appendix comments and remarks: Energy Saving Insurance (ESI) model, could be one of the models considered for energy efficiency and electrification focus area.</p>	
19	Anonymous	Anonymous	N/A**	Link 19
20	Anonymous	Anonymous	N/A**	Link 20
21	Anonymous	Anonymous	N/A**	Link 21
22	Ms. Suba Sivakumaran & Dr. Pierre Horna, Financing For Development Section	UN Economic and Social Commission for Asia and the Pacific (ESCAP)	<p>Chapter 7 : Financing the Just Energy Transition comments and remarks: ESCAP's Financing For Development Section has provided specific comments to chapter 7 of the CIIP. Please see attached in PDF the comments.</p>	Link 22

23	Anonymous	Anonymous	<p>General/overall comments and remarks: All comments included in the attached documents.</p> <p>Chapter 6 : Ensuring a Just Energy Transition comments and remarks: Concerns also arise in the social realm, particularly in the identification and analysis of risks at the project level. emphasizes the absence of an explanation regarding the principles employed in public consultations. Proposing the adoption of the Free, Prior, and Informed Consent (FPIC) principle, AEER advocates for a participatory approach that ensures community involvement in decision-making processes related to energy transition projects.</p> <p>Chapter 7 : Financing the Just Energy Transition comments and remarks: The financial landscape of the JETP scheme raises crucial concerns, particularly regarding the composition of funding mechanisms. highlights the disproportionately low allocation of grants, constituting a mere 3% of total public finance, while loans, both concessional and non-concessional, make up a substantial 74%. This imbalance poses a potential threat to Indonesia's future fiscal space, especially with non-concessional loans carrying the obligation to repay debts at gl</p> <p>Chapter 8 : Enabling Policies for JETP Portfolio comments and remarks: The eighth chapter of the JETP CIPP proposes the removal of the Domestic Price Obligation, which currently caps domestic coal prices in Indonesia. This move aims to introduce enabling policies that enhance the competitiveness of the power sector for renewable energy development. advises caution in this policy adjustment, acknowledging the potential boomerang effect—positive price incentives for reinvestment in coal power plants.</p> <p>The delicate balance required in policy adjustments is unde</p>	Link 23
24	Anonymous	Anonymous	<p>General/overall comments and remarks: The CIPP marks an important step forward in planning the energy transition in Indonesia. The plan represents the first time the world has been able to see in one place many of the elements of information, data, planning, key considerations and potential outcomes that the transition may face in the country. Such information and perspectives should lead to more critically thought-through and fruitful dialogue with the many parties that are looking to come together toward implementation.</p> <p>Chapter 1 : Executive Summary comments and remarks: Please kindly see attachment.</p> <p>Chapter 5 : JETP Pathway and Portfolio of Programs comments and remarks: Please kindly see attachment.</p> <p>Chapter 7 : Financing the Just Energy Transition comments and remarks: Please kindly see attachment.</p> <p>Chapter 8 : Enabling Policies for JETP Portfolio comments and remarks: Please kindly see</p>	Link 24

			attachment. Chapter 10 : Appendix comments and remarks: Please kindly see attachment.	
25	Rizky Tri Septian	Master of Public Policy Specializing on Climate Change, Faculty of Social Sciences, Universitas Islam International Indonesia	N/A**	Link 25

26	Stephan Demmel	Fandem Consulting	<p>General/overall comments and remarks: Dear JETP Secretariat and working groups. Thank you very much for your excellent work in the recent month, resulting in a comprehensive CIPP. I hope that my comments can be a good inspiration for you and enhance your already admirable work. The rationale of each of the points below is described in a dedicated paragraph in the attached document JETP Comments.</p> <p>Chapter 2 : CIPP Overview comments and remarks: -Aim for partial decarbonization of captive power by integrating on-site RE in a decentralized approach</p> <p>Chapter 4 : Impact on Indonesia’s Economy: A Case for Energy Transition comments and remarks:</p> <ul style="list-style-type: none"> -The positive impact on the economy is not sufficiently substantiated by credible analysis. -Highlight that the JETP actions not only improve the economy in absolute terms, but also increase its resilience towards crisis. -Ensure that every element of the ecosystem has sufficient maturity and resources to deliver the expected results. Problems and inefficiencies are unavoidable if ecosystems or value chains are created “from scratch” -Indonesia should “choose its battles” in manufacturing <p>Chapter 5 : JETP Pathway and Portfolio of Programs comments and remarks: -Efforts must move from planning to action. Accepting that there will be complications can help to prepare for those situations, softening their impact</p> <ul style="list-style-type: none"> -In Indonesia, prioritizing decentralized projects close to the load might be preferable to large-scale infrastructure -The selection criteria of priority projects should benefit projects based on externalities rather than solely LCOE as well as projects that are unconditional (independent of uncertain project or policy outcomes) <p>Chapter 7 : Financing the Just Energy Transition comments and remarks: -Including MDBs and DFIs staff in the JETP could potentially help to increase the conversion ratio of priority projects to funding by those organisations</p> <p>Chapter 8 : Enabling Policies for JETP Portfolio comments and remarks: -The proposed change of DMO should be accompanied by an obligation on economic dispatch based on the real cost of coal for PLN</p> <ul style="list-style-type: none"> -With or without Energy Transition, the power system cost will increase and there should be a societal consensus on who pays the bill, the PLN revenue model will not substantially change this fact. With the Energy Transition, many positive externalities are created, that could justify the beneficiaries of those externalities to pay a fair share <p>Chapter 9 : JETP Implementation and Governance comments and remarks: -Governance needs an</p>	Link 26
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			<p>additional layer between the program management and the implementation on project level. Action oriented location- and technology-based “units” can have multiple benefits for implementation, performance monitoring and communication</p> <ul style="list-style-type: none"> -Important tasks related to project/program management, project planning, knowledge sharing and communication remain unallocated -Monitoring must cover the status of projects in terms of development stages to allow for early warnings and remedies 	
27	Anonymous	Anonymous	N/A**	Link 27
28	Anonymous	SOAS University of London (Community feedback)	General/overall comments and remarks: We make brief community feedback to share several recommendations and perspectives in the proposed CIPP draft. Nevertheless, we would like to give a massive appreciation for the chance from the JETP Secretariat to provide the opportunity to facilitate this public feedback.	Link 28
29	Will O'Sullivan	Anonymous	N/A**	Link 29

* *Link to sanitized attachment from the respondents*

***Only attachment was submitted by the respondent*