



Comprehensive Investment and Policy Plan

Rencana Investasi dan Kebijakan Komprehensif

Public Feedback Response Matrix

Kumpulan Tanggapan Umpan Balik Publik

1st – 14th November 2023

Chapter 1

Public Submission Number*	Comment	JETP respond to comment
4	Need clarification on the rationale of increasing the target to 250 MT CO2 by 2030 from the previous 290 MT CO2 by 2030, and to 44% of renewable energy generation share by 2030 from the previous 34% by 2030, after removing captive coal capacity from this CIPP. This is quite a steep increase considering Indonesia's history of slow uptake of renewable energy.	We acknowledge your comments and appreciate the input. This is based on the modelling scheme that was agreed on for the current JETP target scope which only covers on-grid power.
4	Need clarification on the rationale of why the amount of money allocated to each Investment Focus Areas (IFA) are not consistent with their ranking. i.e IFA 1 on Transmission Lines and Grid Deployment ranks number 1 in priority, but is allocated budget way below than IFA 3 on Dispatchable Renewable Energy Acceleration.	We acknowledge your comments and appreciate the input. This allocation is aligned on the requirements for each IFAs. More on this can be read at Chapter 5. Funding coming from IPG (Public money) will be allocated mostly on projects with lower return. IFA #3 and #4 projects can be considered with private sector.
10	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.	We acknowledge your comments and appreciate the input. Isolating the impact of \$20 billion will be a sizeable task. This assumes a model where we identify a scenario that is BAU + \$20 billion. It will be difficult to clearly define what "BAU" is. The result of the modeling will likely be high-effort, but incomplete.
11	The exceptionally high VRE acceleration capacity of 40.4 GW buildout by 2030 raise concerns about accuracy of the resources, practicality and implementation; thus need more concrete and implementable projects.	We acknowledge your comments and appreciate the input.
11	A well-defined roadmap for enforcement and monitoring is absolutely crucial to guarantee the success of VRE acceleration efforts. This framework provides the necessary structure to maintain accountability and transparency, essential elements for the effective implementation of VRE projects. Once a Power Purchase Agreement (PPA) is signed, it should not be subject to renegotiation, as	We acknowledge your comments and appreciate the input.

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	it's a legally binding contract. Any potential renegotiation should adhere to the legal principles governing contracts.	
11	The governance structure seems robust on paper, involving various committees and working groups. Still, it remains to be seen how efficiently they collaborate and navigate the complexities of diverse funding sources.	We acknowledge your comments and appreciate the input.
12	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.	We acknowledge your comments and appreciate the input.
14	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. [THIS IS JUST SUMMARY - 62 pages attachment overall]	We acknowledge your comments and appreciate the input. We have allocated Chapter 6 to talk in details about the "Just" aspect of JETP.
15	<ul style="list-style-type: none"> • Proposed changes / addition: <ul style="list-style-type: none"> - To add "Maintaining long-term financial stability for IPPs and other major stakeholders" as part of the guiding principles - To mention detailed plan to capture and outline the transition plan for the captive power plants and off-grid systems. - To incorporate energy efficiency and other decarbonization technologies, such as carbon sink in the next focus areas for the next version of CIPP document - To 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. • Rationale: <ul style="list-style-type: none"> - Capture broader sets of stakeholders which might be impacted by JET beyond national utility to ensure a level competitive playing field across players - Essential to capture both on-grid and off-grid to enable comprehensive view of energy transition pathway 	We acknowledge your comments and appreciate the input. We have incorporated your first point in the 2023 version of the CIPP. Other points are outside the scope of the JETP Joint Statement.
16	p.4 "Eight overarching policy enablers considered crucial to bringing forward Indonesia's ambition for energy transition" There was a minor yet misleading error, it should've been seven, instead of eight. 1. Strengthening Domestic Supply Chain of Renewable Energy by reforming Local	We acknowledge your comments and appreciate the input. This change has been reflected in the 2023 version of the CIPP

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	<p>Content Requirement (LCR);</p> <ol style="list-style-type: none">2. Adjusting supply-side incentives.3. Improving RE procurement processes.4. Making power purchase agreements more bankable;5. Enabling early coal retirement and managed coal phase-out;6. Ensuring PLN's financial sustainability; and7. Strengthening financing policies to support Indonesia's energy transition.	
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Chapter 2

Public Submission Number	Comment	JETP respond to comment
<u>1</u>	<p>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 Gorup (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. 	Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Aspek 'Just' merupakan komponen penting dalam rancangan transisi energi JETP. Beberapa aspek Just memang hanya dijabarkan secara rinci pada Bab 6. Pemerintah daerah akan diikutsertakan pada saat setiap proyek individu di jalankan.
<u>1</u>	<p>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 pokja ini karena prinsip yang diusung tak hanya mengenai human rights namun gender equality (bab 6). 	Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Semua CSO dan anggota publik dapat memberikan masukan di website. Masukan ini akan kami tanggapi secara berkala.
<u>4</u>	The inclusion of “accelerated retirement of CFPPs” as the primary condition for the success of the joint conditional targets, yet only including 1.7 GW (already funded by ETM, meaning no new fund committed) for early retirement, raises some inconsistency concerns. (P9). Given that an additional 3GW of CFPP (not including captive) is expected to come online between 2024-2030, the retirement of 1.7GW fails to significantly shift the balance in the opposite direction.	We acknowledge your comments and appreciate the input. We have included 5.2 GW of capacity in our model with the addition of 1.7 GW.
<u>4</u>	P13 only mentions about on-grid modelling on the current information known on existing and planned captive coal capacity, peaking at 290 MT is considered to be extremely difficult. It lacks elaboration on any modelling or assumptions regarding the on-grid capacity to peak emission. Given that the total on-grid CFPP is 33GW, with the captive coal capacity estimated at 13 GW (acknowledging the incomplete picture according to the CIPP), there is a need for further clarification on the methodology employed by the Secretariat to establish the ambitious new target of 250 MT CO2.	We acknowledge your comments and appreciate the input. The methodology employed by the Secretariat to establish the ambitious new target of 250 MT CO2 can be further explored in Chapter 5.

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8	Understanding that the CIPP is not a binding document and subject to approval and further deliberation of the National Energy Transition Task Force (SATGAS TEN), the CIPP should adopt a “whole-of-government” approach that maps out relevant government programs, initiatives, and plans and pinpoints where government programs at the ministerial and regional government level can fit within the Just Energy Transition Partnership.	We acknowledge your comments and appreciate the input. Mapping out overall relevant government programs, initiatives, and plans will be the responsibility of the SATGAS TEN as a whole. The CIPP only covers those that are part of the JETP energy transition plan which is only a part of the whole Indonesia energy transition journey.
11	The transparency and engagement with stakeholders are highlighted, but the effectiveness of these interactions remains to be seen. It would be beneficial to have more details on how feedback from stakeholders, including business associations and developers, is being incorporated into the decision-making process.	We acknowledge your comments and appreciate the input. Feedbacks from public can be submitted to our website and we will periodically address them.
11	Furthermore, the multitude of working groups and institutions involved raises concerns about coordination and efficiency. Streamlining these efforts and ensuring effective collaboration is crucial for the success of the initiative.	We acknowledge your comments and appreciate the input. Working group members and leaders communicated with each other regularly.
12	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.	We acknowledge your comments and appreciate the input. We plan to measure inertia early to understand real inertia needs and avoid overspending during our implementation period.
14	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. [THIS IS JUST SUMMARY - 62 pages attachment overall]	We acknowledge your comments and appreciate the input. We have allocated Chapter 6 to talk in details about the "Just" aspect of JETP
15	Proposed changes / addition: - 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	We acknowledge your comments and appreciate the input. We have addressed the first bullet point on the 2023 version of the CIPP. As mentioned in Appendix 10.17, we will conduct a further study to accomplish exactly what you have mentioned.
26	Aim for partial decarbonization of captive power by integrating on-site RE in a decentralized approach	We acknowledge your comments and appreciate the input. This is a strong lever that

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		can be used to reduce emissions from the off-grid system. The JETP Secretariat has planned a future 6-month in-depth study where a comprehensive report would be conducted surrounding the off-grid system, including decarbonization levers.
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Chapter 3

Public Submission Number	Comment	JETP respond to comment
8	<p>Implementing JETP poses challenges in quantifying its impact on achieving the National Determined Contributions (NDC) targets in the energy sector. While international funding can support certain aspects of JETP, it remains to be seen how much the government needs to independently raise to meet the overall NDC targets in the energy sector. Specifically, suppose international assistance contributes to meeting NDC targets in some energy sectors. In that case, there is a need for clarity on the amount of funding required from the government to achieve the broader NDC target</p> <p>The CIPP document should assess the implementation of JETP and its ability to fulfill the commitment.</p>	<p>We acknowledge your comments and appreciate the input. We will clarify with the government for the total cost to meet the NDC target in the energy sector</p>
8	<p>Ignoring RUED (General Regional Energy Plan) policies. Provincial-level regional governments have energy policies that need to be confirmed in the discussion in Chapter 3. RUED should be an integrated policy in the energy transition policy so that regional governments that are ready can be involved in the energy</p> <p>There must be involvement of local governments or at least open space for participation in the generation of renewable energy or implementation of JETP in their region. Whether the project is in RUPTL or not, ensuring it is in RUED is vital.</p>	<p>We acknowledge your comments and appreciate the input.</p>
12	<p>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>We acknowledge your comments and appreciate the input. We will make sure to measure inertia during CFPP implementation</p>
14	<p>“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</p>	<p>We acknowledge your comments and appreciate the input. We have allocated Chapter 6 to talk in detail about the "Just" aspect of JETP</p>

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	chapter is too focused on electricity generation only and left out other sub-sectors of energy. [THIS IS JUST SUMMARY - 62 pages attachment overall]	
18	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. [READ THE DETAILS in attachment]	We acknowledge your comments and appreciate the input. We will consider the framework as a reference.

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Chapter 4

Public Submission Number	Comment	JETP respond to comment
<u>1</u>	<p>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>Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Kami setuju bahwa dampak sosial ekonomi terhadap sektor informal perlu diperhitungkan karena pengaruhnya pada masyarakat yang terlibat. Namun saat ini dampak tersebut tidak dapat kami kuantifikasi lebih lanjut karena keterbatasan informasi yang lengkap. Saat ini JETP telah merencanakan studi lanjut di lini 'Just Transition' untuk mengetahui lebih lanjut mengenai hal tersebut.</p>
<u>8</u>	<p>There needs to be a clear strategy that shows how the CIPP aims to facilitate the workforce into employment in Green Jobs. Although there is an understanding to provide on-the-job training, capacity building, and vocational training (among others) this does not consider current government policies such as the Occupational Mapping (Peta Okupasi) delivered through the National Planning Agency (BAPPENAS) We need a clear strategy on this, i.e the need to finance proposals for social protection for the impacted groups.</p>	<p>We acknowledge your comments and appreciate the input. JETP has planned further study into the impacts on employment.</p>
<u>11</u>	<p>The Wind Farm industry's primary focus in Indonesia should not be on establishing a second-tier manufacturing sector. Instead, it should prioritize the following key aspects to ensure the sector's growth and success:</p> <ol style="list-style-type: none"> 1. Developing a Skilled Workforce and Equipment for Construction: To thrive, the industry needs a solid skill base for construction, erection, and commissioning activities. Companies like PT Berdikari Pondasi Perkasa Tbk and Royal Dutch LV Logistics should be engaged in 	<p>We acknowledge your comments and appreciate the input. We will focus on enhancing local capabilities and skills while utilizing existing resources to support the growth and sustainability of the Wind Farm industry in Indonesia.</p>

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	<p>regular, consistent work rather than sporadic, specialized projects with significant time gaps in between. This will allow them to offer competitive rates and low-risk solutions to Independent Power Producers (IPP). Currently, the industry often considers these tasks as specialist and ad hoc, which can be costly.</p> <p>2. Utilizing Local Resources: It's important for the industry to consider using local towers for Wind Turbine Generators (WTG) where technical and commercial specifications allow. Companies like Kenertec, a certified local manufacturer (has established utility-scale wind tower production in Cilegon, Banten) can be valuable partners in this regard.</p> <p>3. Building Local Capabilities for Turbine Operation and Maintenance Overhaul: The industry should focus on developing the capability for main shaft bearing replacement and gearbox overhaul within Indonesia. Leveraging the existing skills and expertise in mineral processing and mining can lead to synergistic opportunities. This approach not only contributes to the sustainability of local businesses but also lowers the overall operational and maintenance costs for Wind Farms. It is not advisable to pursue the logic of having Wind Turbine Generator Original Equipment Manufacturers (WTG OEMs) set up manufacturing operations in Indonesia. The market is not substantial enough, and the cost attractiveness is insufficient to justify such an endeavor. IPPs are more inclined to pursue site-specific technology types directly from OEMs and may not see value in being tied to particular manufacturing entities. Therefore, it's more pragmatic to focus on enhancing local capabilities and skills while utilizing existing resources to support the growth and sustainability of the Wind Farm industry in Indonesia. It's a sensible and relevant target for Indonesia, capitalizing on the existing skills and infrastructure while contributing to the expansion of the renewable energy sector.</p>	
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<u>12</u>	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.	We acknowledge your comments and appreciate the input.
<u>12</u>	Indonesia will have to allow for increased pricing and long lead times as the renewables suppliers are struggling to meet global demand. Even logistics is a problem, especially for wind farms.	We acknowledge your comments and appreciate the input. Will consider this during implementation.
<u>14</u>	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. [THIS IS JUST SUMMARY - 62 pages attachment overall]	We acknowledge your comments and appreciate the input. We will undertake a more detailed study on impacts on employment, including in other sectors, during project implementation.
<u>15</u>	Proposed changes / addition: 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.	We acknowledge your comments and appreciate the input. JETP focuses on RE transition. CCUS is out of scope for JETP investment.
<u>17</u>	Impact on other sector: Based on IETO, Solar PV capacity additions will need to expand to as high as 27 GW per year in 1.5-S, with the correct regulation, this will benefit also the local PV industry	We acknowledge your comments and appreciate the input. Expansion of PV capacity will indeed benefit the local PV industry.
<u>26</u>	"-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"	We acknowledge your comments and appreciate the input. We have incorporated this in the 2023 version of the CIPP.

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Chapter 5

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4	Table 5.2-1 uses a fixed price assumptions for biomass, coal, and natural gas spanning from 2022 to 2050. While it is acknowledged that these assumptions are aligned with RUKN and are likely used for the sake of consistency, this is still a highly unlikely scenario, casting doubt on the credibility of the entire modelling outcome.	We acknowledge your comment and appreciate the input. We wish to reaffirm that the JETP is strategically designed to reflect Indonesia's current energy landscape as depicted by the RUKN model.
4	Table 5.2-5 on P44 and Figure 5.5-1 on P81 predicted an increasing amount of coal capacity up to 2040, before finally decreasing. This scenario does not depict JETP as platform to fund early retirement of coal, and again, inconsistent with the primary condition to achieving the joint conditional target.	We acknowledge your comment and appreciate the input. Upon revisiting the figure and the accompanying data, we see your point regarding the decline in coal capacity from 2030 onwards, not an increase as previously stated. The figure indeed shows that coal capacity is expected to peak at 40.6 GW by 2030 and then decline to 39.4 GW by 2040, indicating a commitment to reducing coal dependence consistent with the JETP's objectives. Thank you again for your contribution to ensuring the accuracy and clarity of our work.
4	P50. Need clarification on what refers to as "a climate policy" that will enable the sudden rapid increase of renewable energy as well as accelerated emission reduction that is more ambitious than the RUKN between 2030-2040.	We acknowledge your comment and appreciate the input. The term "a climate policy" as mentioned in our report specifically refers to the strategic action to cap emissions at 250 Mt by the year 2030. The specific pages where this policy is outlined and its impact analyzed are pages 42, 52, 57-58, and 84 of the final CIPP document.
8	While RE development targets increase by 44%, we are yet to see a feasible roadmap and timeline for at least the first 12 months of implementation. Also, coal derivatives considered "New Energy" (energi baru) are still mainly included	We acknowledge your comment and appreciate the input. Regarding the roadmap for RE development, it's important to note that

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		the roadmap is a distinct document from the CIPP. As for the inclusion of coal derivatives as "New Energy" in the JETP scenario, this is reflective of the assumptions and scenarios outlined in the RUKN. The JETP scenario adopts these elements from the RUKN, focusing specifically on renewable energy aspects.
8	Has consultations with main stakeholders such as PLN and MEMR been done? As we can see in the 1st Chapter, key principles include "Maintaining long-term financial stability for PLN and its subsidiaries." This will have implications for the increased 44% RE target	We acknowledge your comment and appreciate the input. We have indeed conducted thorough consultations with major stakeholders, including PLN and MEMR. These discussions were integral not only in the development of the model but also during joint sessions focused on model development with both PLN and MEMR.
8	Hydropower (+9 GW) and geothermal (+4 GW) lead the way for dispatchable RE until 2030. Big emphasis on hydropower development, most notably in 2036-2040	We acknowledge your comment and appreciate the input. We understand your concern regarding the rapid enhancement of hydro and geothermal capacities. Please be advised that these projected expansions are feasible under the strict conditions that all enabling factors and risk mitigation measures, as detailed in Chapter 8 of our report, are effectively implemented. For example, in geothermal development, the application of binary power plants and governmental drilling programme are essential to expedite the additional capacity within this timeframe.
8	Bioenergy represents a contribution (+3 GW) with biomass co-firing contributing to the overall generation mix	We acknowledge your comment and appreciate the input. However, in order for us to provide an appropriate response, we would need clarification in relation to the context and objective of your query. We invite you to elaborate whenever convenient.
8	The CIPP draft has identified the risk of the biomass feedstock but has not yet included a detailed explanation of the utilization strategy of locally sourced biomass feedstock, as well as the intersection with land-use and deforestation issues	We acknowledge your comment and appreciate the input. In response to your feedback, we have mentioned these topics as part of further study, which is necessary to

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		enhance the CIPP document. For the complete list of required further study, please refer to Appendix 10.17.
8	While the ambition to increase renewables share by 2030 is welcomed, there is an excessive focus on biomass and hydropower and overly conservative limits on solar power expansion. There is no reason why Indonesia cannot pursue more than 32 GW of solar to be installed before 2030, based on experiences from China among others. China has successfully installed 130 GW of solar power in the first 9 months and is expected to install 200 GW this year alone (Source: CREA).	We acknowledge your comment and appreciate the input. Regarding the focus on biomass and hydropower, it is important to note that for hydropower, PLN has a well-established list of projects, complete with feasibility studies as part of the Selected Providers List ("Daftar Penyedia Terseleksi"/DPT). The existing potential for these projects allows for an expedited implementation process, pending the procurement process at PLN. As for solar PV, we acknowledge the potential for a higher capacity installation. However, we currently face limitations related to network availability that can effectively integrate solar PV, primarily due to intermittency issues. The CIPP has included top priority project for IFA #1 that will facilitate the integration of VRE.
8	CIPP ignores community-based renewable energy development. Community-based renewable energy opens up access to electricity for poor people, especially those in remote rural areas. Poor people's access to electricity is their right to development (economic, social, and cultural/ecosoc rights). The state must fulfill this right. Without paying attention to community-based renewable energy development, JETP has ignored the values of justice	We acknowledge your comment and appreciate the input. The topics you've raised are indeed important and are considered as part of our risk assessment process. To address these concerns, we have outlined a suggestion to conduct further assessment for these topics which are briefly explained in sub-chapters 6.2.2.1 and 7.2.1 of the CIPP.
8	There is no further explanation of how this significant increase in RE share (i.e. 44 percent of total power generation by 2030) will be strategically achieved in the current sluggish RE development and the significant overcapacity of power	We acknowledge your comment and appreciate the input. The 44% renewable energy share by 2030 is conditional upon the availability of funding and enabling policies.
8	Nuclear part of CIPP JETP scenario generation by technology to push for energy transition (pages. 44) Many countries have abandoned nuclear power including Japan, which closed many nuclear plants after the Fukushima incident. Does Indonesia still have the ambition to pursue high-risk nuclear technology?	We acknowledge your comment and appreciate the input. The JETP model scenario is developed based on the RUKN model to align with Indonesia's specific energy context. The incorporation of nuclear technology in the JETP scenario reflects its

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	By today's standards and technology, building a nuclear power plant is more expensive than a RE plant	presence in the RUKN model. However, it's important to note that the primary focus of JETP is on the development of renewable energy scenarios.
8	Geothermal investment per kW 4,000 USD (page 40). Geothermal is estimated to be a high cost of technology with a high scale of social conflict and deforestation. JETP needs to consider carefully when pursuing Geothermal as a viable energy project	We acknowledge your comment and appreciate the input. CIPP includes Just Transition Framework that will address social and economic issues. For more information, please refer to chapter 6 of the CIPP. In addition, as part of the priority projects, CIPP includes government drilling programme that will enable the acceleration of the geothermal development programme. For more information, please refer to chapter 5 of the CIPP
8	The CIPP JETP shows that the cost of adding CCUS will reach 1,950 USD per kW in 2020, and 1,790 USD per kW is more expensive than other technologies, especially solar PV which is 790 USD per kW. By including CCUS in the CIPP JETP document it opens up opportunities for expensive investments and maintaining the coal power plant in the long term. JETP will include the CCS as an additional coal power, as seen in select technology investment cost assumptions (page 40)	We acknowledge your comment and appreciate the input. Please bear in mind that JETP pathway focuses on expanding renewable energy capacity with a view to achieving carbon neutrality for the power sector. The inclusion of CCUS in the JETP model is due to the fact that JETP model uses RUKN as a basis.
8	Ammonia and Hydrogen are still included in the investment area (page 141). Fossil energy is still used in "clean" energy generation. Coal will be used to produce ammonia, while gas will be used to produce hydrogen.	We acknowledge your comment and appreciate the input. However, in order for us to provide an appropriate response, we would need clarification in relation to the context and objective of your query. We invite you to elaborate whenever convenient.
8	There is no detailed explanation for why the JETP scenario in 2040-2045 saw such a high spike in natural gas use from 19.8 TWh to 68.4 TWh (page 44). Gas as fossil energy, which contributes to the increase in carbon emissions still plays an essential part in the problematic energy transition. Using gas directly or as hydrogen/ammonia material raises concerns about an energy transition that accommodates false solutions	We acknowledge your comment and appreciate the input. Full system flexibility and adequacy studies that consider full year of hourly dispatch and multiple stochastic VRE, demand profile, and thermal plant outages patterns are required to better assess the utilisation factor of the gas-powered fleet. However, as a relatively costly marginal source of generation, gas power plays a load-following and peaking roles. This is also

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		noticeable in the power generation mix; natural gas reduces its share of total generation from 17% in 2025 and 2030 to less than 10% for the period 2035-2050. The sudden changes in the generation and capacity trends are influenced by the development of other sources of generation, including the build-out of renewables (which can follow lumpy patterns in the case of long-lead time projects such as hydropower and geothermal), the phase-out of coal power (which accelerates after 2035) and development of inter-island interconnections.
8	<p>In the JETP scenario, the role of bioenergy co-firing in coal power plants also increases, with the share of co-firing rising to 7% in 2030 and 9% after 2040. (page 69). Biomass and low-emission fuels co-firing at existing thermal power plants is a possibility to increase the share of renewables in the power system while providing flexibility from existing assets (page 60). Research estimates that the energy plantation area required for 18 GWh capacity is at least 2.33 million hectares. In 2019, 38% of the total energy plantation came from natural forest deforestation. It is not impossible that emphasizing the proportion and expanding the implementation of biomass co-firing in the energy mix scheme could threaten forest sustainability in the future</p> <p>Land expansion for ultra-massive energy procurement, on a national scale, impacts the loss of the environment and ecosystems that support every form of life. Along with escalating environmental degradation, which eventually leads to the climate crisis, it raises the chance of structural poverty. Converting land to energy plantations will alienate local communities that used to rely on local forests or plantations to access their daily needs.</p>	<p>We acknowledge your comment and appreciate the input. We acknowledge the importance of the concerns raised regarding the sustainability of forest resources and the potential environmental and social impacts of expanding biomass co-firing in our energy mix. Recognizing these critical issues, as mentioned in chapter 8 and further detailed in appendix section, we propose conducting a dedicated study in a separate session to thoroughly examine and address matters related to land use and its implications.</p>
8	<p>The 2023 version of the CIPP would only have an on-grid emissions target and pathway. The CIPP includes a technical pathway for the on-grid system with a 250 MT target for the on-grid power system in 2030.</p> <p>More time is needed to understand the current online and planned captive coal extent, develop strategies to manage better industrial energy demand (including energy efficiency), set out viable alternatives to meet this demand without coal and determine an ambitious off-grid emissions target.</p> <p>The JETP Secretariat will begin conducting an extensive explorative study around the off-grid systems to provide a better understanding of the captive decarbonization strategies to conclude the study within six months of starting this work. Like the CIPP, the study will provide some form of a target for the captive</p>	<p>We acknowledge your comment and appreciate the input. Following the launch of the CIPP document, the JETP Secretariat plans to initiate a study focused on captive power. This study aims to provide a detailed analysis of decarbonization strategies in the captive sector.</p>

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	sector and recommend the concrete steps the Indonesian government can take to limit captive emissions.	
8	Recent findings show difficulties caused by a certain level of capacity limitation by PLN distribution units on rooftop solar permits, even though MEMR Regulation 26/2021 allows rooftop solar installation up to 100% of the connected electricity capacity.	We acknowledge your comment and appreciate the input. We will pass this to the relevant government and PLN.
8	On captive coal power plants The CIPP document excludes captive power plants for industry from the plan. The government considered coal energy a competitive enabling tool in investment and trade, especially downstream (critical mineral industry). The world is now shifting towards cleaner energy. The competitiveness of dirty energy will decline. Large companies with high standards prefer countries with clean energy. By relying on dirty energy, Indonesia will actually lose its competitiveness among high-standard large company. Meanwhile, those companies generally have greater economic value-added, including paying higher wages. By relying on coal energy, Indonesia will only attract low-standard industries which generally also have lower economic value added, including paying cheaper wages.	We acknowledge your comments and appreciate the input. As mentioned in Appendix 10.17, we will conduct a further study to accomplish exactly what you have mentioned.
11	[In the attachment] 22 pages overall SOLAR PV (detail is explained in the document) The program advocating an extensive expansion of solar PV in Indonesia appears to portray an overly optimistic view, failing to account for critical limitations and constraints intrinsic to solar energy. This lack of acknowledgment may lead to unrealistic projections and unattainable outcomes, primarily due to fundamental factors that directly impact the feasibility and practicality of solar power in Indonesia's context.	We acknowledge your comments and appreciate the input. We appreciate your perspective on the challenges and limitations associated with the expansion of solar PV in Indonesia.
11	[In the attachment] 22 pages overall WIND (detail is explained in the document) The prioritization of unproven wind projects on the top priority list, despite the presence of established, viable alternatives, warrants scrutiny. This critique highlights the significance of informed and evidence-based decisions in energy planning to ensure the most efficient and effective outcomes for the energy sector. The sender highlight several wind power projects that are part of priority projects including Aceh wind farm and Banten wind farm.	We acknowledge your comments and appreciate the input. Your inputs will be passed on the relevant government and PLN.
11	[In the attachment] 22 pages overall Biomass (detail is explained in the document) 1. On page 93, it is stated that the Government of Indonesia has identified a total of 57 GW of nationwide bioenergy potential. However, there appears to be a contradiction in the actions of PLN (Perusahaan Listrik Negara), the state-owned electricity company. PLN is limiting the capacity of biomass energy projects to	We acknowledge your comments and appreciate the input. Your inputs will be passed on the relevant government and PLN.

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	<p>economically unviable sizes in the RUPTL (Electricity Supply Business Plan) and in recent market-sounding activity. This is a concerning discrepancy as it contradicts the national potential and the government's objectives for developing bioenergy. To ensure an effective transition to sustainable energy, it is imperative that PLN aligns its plans with the identified national bioenergy potential</p> <p>2. To effectively harness the potential of variable renewable energy sources, a Feed-In Tariff (FiT) mechanism is essential. FiT provides a guaranteed payment rate for renewable energy producers, which incentivizes investment and ensures a reasonable return on investment. It promotes the development of renewable energy projects, including biomass, by offering price predictability and mitigating financial risks</p> <p>3. The Presidential Regulation No 112/2022 stipulates step-down pricing for renewable energy sources, intending to control costs and ensure sustainability. However, this regulation may not effectively apply to biomass due to the unique challenge of feedstock inflation. One key challenge with step-down pricing for biomass energy is the inflation of feedstock costs over time. Biomass energy relies on managing the costs associated with sourcing, processing, and transporting these materials can vary significantly. If the feedstock costs continue to rise, step-down pricing may result in uneconomic conditions for biomass energy projects, making them financially unsustainable. To ensure the success of biomass energy projects and to account for the potential feedstock cost fluctuations, it is vital to reconsider the pricing mechanisms and adopt more flexible and adaptive pricing strategies. This will enable biomass energy to remain economically viable and contribute to Indonesia's renewable energy goals over the long term.</p>	
11	<p>[FEEDBACK SUMMARY] The feedback highlights three main concerns regarding the RUPTL (Electricity Supply Business Plan) in Indonesia:</p> <p>1. Overly Ambitious COD Targets: The RUPTL sets ambitious Commercial Operation Date (COD) targets for energy projects, which may be difficult to achieve. This raises concerns about the feasibility and practicality of these timelines.</p> <p>2. Inclusion of Uneconomic or Unproven Projects: The plan includes projects that may not be economically viable or are still unproven. These projects often lack essential supporting data, feasibility studies, or due diligence, posing a risk to the success of Indonesia's energy goals. An example given is the 1000 MW Upper Cisokan Pumped Hydro Projects, which have been in the RUPTL since before 2010.</p>	<p>We acknowledge your comments and appreciate the input. Your inputs will be passed on the relevant government and PLN.</p>

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	<p>3. Lack of Accountability for Project Failures: There is no clear system of penalties or consequences for projects that fail to meet their COD targets. This absence of accountability has led to a recurrence of project failures without significant repercussions.</p> <p>To address these issues, the feedback suggests implementing a checklist for quota assets in the RUPTL. This checklist would include:</p> <ul style="list-style-type: none"> - Credible Data and Due Diligence: Ensuring projects have bankable resources, comprehensive feasibility and grid studies, environmental impact assessments, financial assessments, and due diligence processes. - Compliance with COD Targets: Verifying that project timelines and CODs are realistic and achievable, with the possibility of reevaluating or adjusting deadlines for projects unlikely to meet their targets. - Accountability Measures: Establishing clear consequences or penalties for projects that fail to meet their targets, promoting a culture of integrity and accountability. <p>The implementation of this checklist aims to filter out non-viable projects, mitigate the issue of unrealistic targets, and ensure a more prudent selection of projects in line with Indonesia's national energy goals.</p>	
12	<p>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>We acknowledge your comment and appreciate the input. However, in order for us to provide an appropriate response, we would need clarification in relation to the context and objective of your query. We invite you to elaborate whenever convenient.</p>
14	<p>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 effective program management, decision-making, and policy refinement. [THIS IS JUST SUMMARY - 62 pages attachment overall]</p>	<p>We acknowledge your comments and appreciate the input.</p>

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<p>14</p>	<p>The process of legal regulation plays a critical role in shaping the landscape of initiatives such as the JETP Indonesia. As a nation governed by the rule of law, it is imperative to establish a robust legal framework that addresses various facets of the program. Here are several key areas where legal regulations are essential:</p> <p>1. Authority and Procedures: The allocation of authority and the definition of procedures are fundamental aspects of the JETP's governance. To ensure order and coordination in the management of the program, there is a pressing need for regulations that explicitly outline the jurisdiction and processes to be followed by the numerous government agencies and entities involved. These regulations would not only establish a clear hierarchy but also delineate the roles and responsibilities of each party, promoting accountability and efficient decision-making.</p> <p>2. Guidelines and Selection Criteria: To uphold the integrity of the JETP, it is crucial to institute comprehensive guidelines and selection criteria for project funding. While the CIPP has underlined the selection and prioritization criteria for projects, legislation or regulations can provide the necessary structure for defining the criteria by which projects will be evaluated and selected. These criteria should be rooted in clear, objective, and transparent principles, ensuring that projects are chosen based on merit rather than subjective or biased considerations</p> <p>3. Transparency and Accountability: Transparency is a cornerstone of good governance. Therefore, the law should prescribe requirements related to transparency during the project selection and implementation processes. This includes provisions for the publication of information regarding projects that receive funding, allowing stakeholders and the public to scrutinize the use of resources. Additionally, mechanisms for accountability should be integrated into the legal framework to address any deviations or improprieties that may arise during the execution of projects.</p> <p>4. Monitoring, Reporting, and Verification (MRV): The effectiveness of the JETP hinges on its ability to track progress and ensure that funded projects align with predefined objectives and standards. Legal regulations can establish a system for MRV, creating a structured process for monitoring, reporting, and verifying project outcomes. This not only aids in ensuring the program's efficacy but also provides a basis for evidence-based decisionmaking and policy refinement</p>	<p>We acknowledge your comments and appreciate the input. Your inputs will very valuable for the implementation of the CIPP.</p>
<p>14</p>	<p>Page 31 - 32 of the attached PDF regarding inclusion of other technologies that might provide more stable electricity supply which is important for the industrial sector.</p>	<p>We acknowledge your comments and appreciate the input. JETP's current focus on wind, solar, and bioenergy is driven by their economic viability and maturity of technology,</p>

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		<p>which aligns with the least-cost approach of the capacity expansion plan. While the JETP values a diverse renewable mix, the current priorities are set based on technological readiness and cost competitiveness. Emphasize that the inclusion of other renewable sources like tidal and wave energy will be revisited as these technologies mature and become more economically feasible</p>
15	<p>Proposed changes / addition:</p> <ul style="list-style-type: none"> o To 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 To detail out incentives to support infrastructure on renewable energy value chain localization, particularly on Solar value chain – for example: land grants from the government for the Solar OEM which plans to localize its manufacturing capabilities, Tax holiday and incentives and expedited regulatory process for land acquisition, AMDAL and other business licenses. 	<p>We acknowledge your comments and appreciate the input. Regarding the top-priority projects, we have a dedicated analysis in subsection 5.3.3, where factors like FID status, RUPTL listing, and prioritization by PLN & ESDM are already integrated into the project assessment framework, as outlined in the attached figure. This ensures that our prioritization is aligned with current strategic developments and regulatory provisions.</p> <p>On incentives for renewable energy value chain, particularly for solar, we have included a policy framework that advocates for supporting infrastructure development. This includes proposals for land allocation for Solar OEMs planning to localize manufacturing in Indonesia and outlines a series of potential fiscal measures and regulatory facilitations, aiming to bolster investment and operational efficiency in this sector.</p>
17	<ul style="list-style-type: none"> o Table 5.2-6 Key electricity demand, efficiency, and electrification drivers in the JETP scenario; what about building energy intensity (kWh/m²) improvements? o Figure 5.2-12 Average annual power sector investments in the JETP scenario o Based on IETO. Between 2018 – 2030 total investment: USD 83 billion RE capacity, USD 75 billion transmission and distribution, USD 5.5 billion battery storage o Investment Focus Areas: agreed that focus number 1 is the development of transmission networks. o 5.4 Investment Focus Area #1: Transmission Lines and Grid Deployment 	<p>We acknowledge your comments and appreciate the input. While the current demand side analysis does address efficiency, we acknowledge the importance of building energy intensity. To further explore this aspect, a dedicated working group will be convened in the near future to specifically focus on energy efficiency within various sub-sectors, including buildings</p>

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	o In the short-term alone (to 2030), investment totalling USD 43 billion in domestic transmission, USD 32 billion in distribution, and USD 5.5 billion in energy storage is required.	
18	OECD CEFIM, 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. [READ THE DETAILS in attachment]	We acknowledge your comments and appreciate the input. It's important to ensure alignment and efficiency in our efforts. To this end, we suggest coordinating closely with the JETP Secretariat. This will help in avoiding any potential overlaps in studies and ensure optimal use of resources. Your focus on the financial aspects of energy efficiency is greatly appreciated and adds significant value to our collective objectives.
24	Biomass price p.38 – Table 5.2-1. Please clarify whether biomass price is normalized toward similar coal grade utilized by PLN and IPP. Kindly note that transportation charges for biomass will be likely be more significant than coal due to lower energy density and complexity.	We acknowledge your comments and appreciate the input. We acknowledge the necessity to clarify the pricing normalization of biomass with respect to coal grades used by PLN and IPPs. The prices for biomass are indeed adjusted for energy content relative to coal in the model, and this adjustment is intended to account for differences in energy density and transportation considerations. A note has been added below Table 5.2-1 in the latest version of the CIPP document to ensure this information is transparent.
24	Rationale for elevated demand growth projection [CRITICAL] p.42. Table 5.2-3. It would be important to elaborate more on the justification for 5.8% annual demand growth assumption used by JETP Scenario, as opposed to PLN's more conservative demand growth. PLN current excess capacity and financial strain have been mainly caused by inflated growth assumption. The fear of repeating past mistakes will likely continue to reside in multiple institutions. In later pages, captive connection to 2040 was specified to amounted to only 42TWh [p.36, Table 5.2-6]	We acknowledge your comments and appreciate the input. The assumption of a 5.8% annual demand growth in the JETP Scenario is based on the RUKN model, which employs a set of variables and assumptions distinct from those used in PLN's forecasts. It's important to note that the RUKN model's projections extend to 2060, whereas the JETP scenario projections are limited to 2050. Furthermore, the JETP scenario incorporates expected developments in captive power, a factor not included in PLN's projections, contributing to the variance in projected demand growth rates. To ensure clarity, we

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		have revised the narrative in the latest version of the document to better reflect these distinctions
24	Gas price assumption p.38 – Table 5.2-1. Assumption that Indonesia can maintain gas price at US\$6/MMBTU through to 2050 is highly unlikely [Although this assumption may be in alignment with RUKN]. Estimates suggest that the country could become a net gas importer before 2030 and is already undergoing a shift in gas supply from cheaper pipeline-based to more expensive LNG-based sources. Long term LNG price is forecasted in the range between US\$9-11/MMBTU.	We acknowledge your comments and appreciate the input. We would like to emphasize that the JETP is designed to closely mirror Indonesia's current energy profile, which is presently represented by the RUKN model. This alignment ensures that the JETP serves as an enhancement of existing conditions, making it more contextual and relevant to Indonesia's specific energy landscape. In this context, our adherence to the RUKN's assumptions on gas pricing is a reflection of our commitment to maintaining consistency with the national energy profile.
24	Biomass price p.38 – Table 5.2-1. Please clarify whether biomass price is normalized toward similar coal grade utilized by PLN and IPP. Kindly note that transportation charges for biomass will be likely be more significant than coal due to lower energy density and complexity.	We acknowledge your comments and appreciate the input. We acknowledge the necessity to clarify the pricing normalization of biomass with respect to coal grades used by PLN and IPPs. The prices for biomass are indeed adjusted for energy content relative to coal in the model, and this adjustment is intended to account for differences in energy density and transportation considerations. A note has been added below Table 5.2-1 in the latest version of the CIPP document to ensure this information is transparent.
24	Uncapped coal price assumption p.39 – Figure 5.2-2. JETP secretariat assumes 'JETP scenario' full price of coal at US\$70/t. Even with the assumption that the price cap is removed this could be inaccurate and may not reflect actual PLN behavior in forecasting and planning their power system. Suggest to evaluate the potential to use projection based on historical uncapped domestic coal price. [Although this assumption may be in alignment with RUKN]	We acknowledge your comments and appreciate the input. it's important to note that the JETP is designed to mirror Indonesia's current energy profile as outlined in the RUKN document. This approach ensures that JETP remains contextual and relevant to Indonesia's specific energy landscape, which includes adhering to RUKN's assumption of a full coal price of US\$70/t.
24	Rationale for elevated demand growth projection [CRITICAL] p.42. Table 5.2-3. It would be important to elaborate more on the justification for 5.8% annual demand	We acknowledge your comments and appreciate the input. The 5.8% annual demand

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	<p>growth assumption used by JETP Scenario, as opposed to PLN's more conservative demand growth. PLN current excess capacity and financial strain have been mainly caused by inflated growth assumption. The fear of repeating past mistakes will likely continue to reside in multiple institutions. In later pages, captive connection to 2040 was specified to amount to only 42TWh [p.36, Table 5.2-6]</p>	<p>growth assumption in the JETP Scenario is based on the RUKN model, which uses a set of variables and assumptions distinct from those in the PLN forecast. It's important to note that the RUKN model's projections extend to 2060, whereas the JETP scenario projections are up to 2050. Furthermore, the JETP scenario includes considerations for the expected increase in captive power, a factor not incorporated in PLN's projections. This difference in approach contributes to the variance in demand growth rates between the two models. We have made updates in the latest version of the CIPP to clarify this aspect more explicitly</p>
24	<p>Geothermal growth p.44. Table 5.2-4. It would be good to later elaborate how geothermal power generation is expected to nearly double from 2022 to 2025 given its long lead time. Annual demand growth is in the order of 40-100MW with government exploration drilling showing little progress. JETP Secretariat should also demand clarity on the performance and challenges encountered in past government drilling prior to stepping in further.</p>	<p>We acknowledge your comments and appreciate the input. We understand your concerns about the feasibility of nearly doubling geothermal power generation in a short timeframe. To address this, our strategy involves specific conditional measures. These include the use of binary turbines to efficiently reuse existing geothermal heat, thereby reducing the need for new drilling. We are also advocating for increased government support in exploration drilling, which we believe could lower investment risks and encourage more participation in the sector. For example, suggestions like expanding government drilling programs to include multiple large holes are being considered to enhance effectiveness.</p>
24	<p>Geothermal LCOE drop.52. Figure 5.2-10 Please kindly clarify the reasoning for 30% LCOE drop for geothermal from 2025 to 2030. IRENA cost of geothermal LCOE have not seen significant long-term cost reduction, albeit a 22% y/y reduction in 2021-22.</p>	<p>We acknowledge your comments and appreciate the input. Regarding the projected 30% drop in geothermal LCOE from 2025 to 2030, as illustrated in Figure 5.2-10. Our cost projections are based on the "Technology Data for the Indonesian Power Sector" report by DEA and MEMR. These projections utilize a</p>

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		<p>learning rate approach, anticipating cost reductions due to the expected large-scale buildout of geothermal projects in Indonesia and globally. This scale-up is anticipated to enhance efficiency and reduce costs as developers gain more experience in executing these projects.</p> <p>Additionally, the historical trend of geothermal development has been influenced by the relatively low global capacity of geothermal energy. Both Indonesian scenarios and international references, such as the IEA World Energy Outlook, foresee a significant increase in future capacity. Therefore, we believe that relying solely on historical trends might not fully capture the potential cost developments.</p>
24	Data availability of investment p.53. Figure 5.2.11 Please kindly advise why historical power system costs cannot display the breakdown of costs to transmission, variable and fixed costs.	We acknowledge your comments and appreciate the input. The data sourced from PLN for this model is aggregated and does not provide a detailed breakdown of the power system costs into the categories you mentioned. This limitation in the data granularity is reflected in the presentation of the overall historical costs without the specified segmentation.
24	Deployment of flexible coal power retrofit p.78 & p.43. Please advise whether flexible coal power retrofit will be performed on PLN, IPP or a combination. There is a specification for IPP application under PLN's scenario but not on JETP Scenario. Please also kindly advise whether PLN will receive any form of compensation in reducing the coal power utilization, or whether such compensation is deemed unnecessary considering older and less efficient power plants in some situations would rank lower in their merit order.	We acknowledge your comments and appreciate the input. The analysis in the report encompasses the potential for retrofitting coal power plants, covering both PLN-operated and Independent Power Producer (IPP) facilities. The aim is to present a comprehensive view of the investment landscape, estimating the costs for retrofitting the entire fleet, irrespective of whether they are under PLN or IPP ownership. This aspect is further detailed in table 5.5-1 of the updated CIPP document.

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		On the topic of reduced coal power utilization, it is condition upon availability of funding.
24	Municipal waste as priority and climate targets p.96 Table 5.6-5. Eight out of the ten specified biomass project outside of cofiring specify municipal waste power generation, please kindly explain the rationale of these in relation to (i) Climate aims and (ii) Cost effectiveness comparison with other dedicated biomass power plants.	<p>We acknowledge your comments and appreciate the input.</p> <p>Regarding Climate Aims:</p> <ol style="list-style-type: none"> 1. Municipal waste power generation is a crucial component of the broader strategy to meet GHG emission reduction targets in the waste sector. This technology not only generates energy but also contributes to the management of municipal waste, thereby reducing GHG emissions from this sector. 2. This focus is also in alignment with the national agenda to boost waste-to-energy initiatives, as stated in Presidential Regulation No. 35/2018, which aims to enhance waste management practices and sustainable energy production simultaneously <p>Regarding Cost Effectiveness:</p> <p>While it is acknowledged that the cost of municipal waste power generation is higher compared to other dedicated biomass power plants, it is important to recognize that the primary product of these projects is improved waste management. The generation of electricity should be considered a valuable by-product. The investment in this technology transcends mere energy production by addressing waste management challenges, which are a significant source of emissions and public health concerns.</p>
24	Data availability of Take-or-Pay p.53. The specification of country-wide assumption of US\$3.2 c/kWh take-or-pay clause value -as given by PLN and MEMR- indicates the lack of transparency and may raise concerns on evaluation and optimization is performed.	We acknowledge your comments and appreciate the input. Such detailed information regarding business contracts, especially those between two entities like PLN and MEMR, is not commonly disclosed to the public. This practice aligns with standard business

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		confidentiality norms where specific contract details are typically kept between the involved parties.
26	<ul style="list-style-type: none"> -Efforts must move from planning to action. Accepting that there will be complications can help to prepare for those situations, softening their impact -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) 	We acknowledge your comments and appreciate the input.

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Chapter 6

Public Submission Number	Comment	JETP respond to comment
1	<p>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-risikonya. 	<p>We acknowledge your comment and appreciate the input. Stakeholder engagement to address vulnerable stakeholders' needs are indeed critical in the JT assessment process as well as the implementation phase - as depicted on Figure 6.21.</p>
4	<p>Unlike the South Africa JETP where there is clear fund allocation to the “just” aspect such as skill development and municipal capacity, the “Just” element in Indonesia’s CIPP is incorporated only as an additional safeguards (JT framework) for energy projects in Indonesia, on top of other existing safeguards such as AMDAL (Environmental impact analysis) and Land Acquisition and Resettlement Plan.</p>	<p>We acknowledge your comment and appreciate the input. CIPP developed the JT Framework to ensure a focus on opportunities, including economic opportunities as elaborated in Standard 9 - it is not only an addition to AMDAL and Land Acquisition and Resettlement Plan.</p>
4	<p>P119 mention that the full JT assessment is done by the project developers in order to bring the project to a bankable feasibility study stage, before sharing it to JETP Secretariat. Putting the “just” element into project safeguards also seems to transfer the responsibility of ensuring a just transition into the hands of the project developers. P124 also does not provide certainty that lenders will provide funding support in the form of grants to fund the JT interventions Standard 9 (economic diversification and transformation).</p>	<p>We acknowledge your comment and appreciate the input. Chapter 6 describes activity at both project level and at subnational and national level. Responsibility for just transition is the responsibility of all stakeholders. Standard 9’s conceptualization and operationalization will be detailed in further studies as described in Appendix 10.17.</p>
4	<p>The CIPP only mentions about how “economic diversification” is one of the standards within the JT framework, but does not elaborate on what is the actual expected impact of energy transition on coal mining regions to labours and vulnerable communities, and what would be the plan to mitigate it. There should be a central authority that ensures just transition impacts on society as a whole,</p>	<p>We acknowledge your comment and appreciate the input. Standard 9’s conceptualization and operationalization will be detailed in further studies as described in Appendix 10.17.</p>

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	especially on coal dependent regions, are identified and properly addressed, and there should be dedicated funds allocated to this.	
8	Participation and inclusion: one aspect that becomes an essential issue in the Just Energy Transition is the GEDSI (Gender Equality, Disability, and Social Inclusion) aspect. Bad practices of energy governance in groups such as women, disabilities, indigenous groups, and other groups. The energy transition must also ensure that every process and result is people, especially these vulnerable groups. Access, Control, Participation, and Benefits (ACPB) parameters must be well implemented to ensure this.	We acknowledge your comment and appreciate the input. We have identified respective vulnerable stakeholders for each standard as shown in Appendix 10.9.
11	Allocation of task and PICs: Define and allocate responsibilities to relevant government departments or agencies to handle various aspects of the energy transition.	We acknowledge your comment and appreciate the input. This input will be discussed for the next version of the CIPP and in the further study on the operationalization of Standard 9 of the JT Framework as described in Appendix 10.17.
11	Skills Transition Plan: Develop and implement a comprehensive skills transition plan specifically addressing the movement from coal-related industries to the renewable energy sector. This plan could include retraining and reskilling programs, job creation initiatives, and support for affected workers, their families, and communities during the transition period.	We acknowledge your comment and appreciate the input. JETP focuses on the energy transition. We have included a JT Program on supporting human capital development as part of the JETP interventions at the subnational and national level, please refer to Chapter 6.2.3.2. In addition, we expect that implementing the JT Framework and in particular Standards 4 and 9 to include reskilling and other support. Please refer to Appendix 10.9 for further details.
11	Learning from International Experience: Analyze and learn from international experiences at a similar transition. Assess what worked and what didn't and adapt these lessons to the local context to develop a more effective transition plan.	We acknowledge your comment and appreciate the input. This input will be discussed for inclusion in the next version of the CIPP and in the further study on the operationalization of Standard 9 of the JT Framework as described in Appendix 10.17.
11	Compliance with International Standards: Establish mechanisms to ensure compliance with international guidelines, such as IFC PS7 or World Bank ESS7, which outline requirements related to social and environmental impact assessments, community engagement, and cultural heritage preservation.	We acknowledge your comment and appreciate the input. The IFC PS7 has been covered in the JT Framework Standard 3 – Local and customary communities.
11	Practical Implementation: To make the document more actionable, it should provide a step-by-step implementation plan with specific timelines and measurable goals.	We acknowledge your comment and appreciate the input. This input will be

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	Each aspect of the transition, from energy source diversification to workforce development, should be broken down into practical tasks.	discussed for inclusion in the next version of the CIPP and in the further study on the operationalization of Standard 9 of the JT Framework as described in Appendix 10.17.
12	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.	We acknowledge your comment and appreciate the input. Investments and interventions during energy transition should not focus on just one element but take into account all three aspects of the trilemma. An investment to improve energy security should meet expectations around environmental sustainability, and support energy equity, too – and these elements are directly captured by JETP's approach to the Just Transition.
14	General comments in the context of a just energy transition	We acknowledge your comments and appreciate the input.
14	Definition	We acknowledge your comments and appreciate the input.
14	Energy trilemma	We acknowledge your comments and appreciate the input. We also see energy security concept as a multidimensional aspect which includes the economic aspect as well.
14	JT Framework	We acknowledge your comments and appreciate the input.
14	Proposed JT Standards	We acknowledge your comments and appreciate it. Your input will be taken into consideration for the next version of the CIPP.
15	Proposed changes / addition: 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	We acknowledge your comments and appreciate the input. Upskilling and reskilling the current workforce is part of Standard 4: Labor and Working Conditions - please refer to Appendix 10.9 for further details. The proposal for detailed stakeholder mapping will be taken into consideration for inclusion in the next version of the CIPP.

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16	<p>p.111. “The first level of the framework consists of three foundational concepts that underpin the definition of just transition for Indonesia: (i) human rights, (ii) gender equality and empowerment, and (iii) accountability.”</p> <p>These three foundational concepts should be incorporated by the social inclusion concept. Social inclusion involves making deliberate efforts to provide equal opportunities for individuals from diverse backgrounds to realize their full potential in life. Some studies also highlight the importance of the integration of social inclusion and gender equality in just energy transition. This is to ensure that no one is left behind. It includes the involvement of vulnerable groups, particularly fossil-based labours, people with disabilities, indigenous people, and other disadvantaged group that might be affected by the transition.</p>	<p>We acknowledge your comment and appreciate the input. Leave no one behind is indeed one of the two pillars on which the JT Framework is built.</p>
16	<p>p.113: “The JT Framework is designed to incorporate and supplement existing safeguards for energy projects in Indonesia. For example, Gol legally requires that energy projects institute certain safeguards through processes such as the AMDAL (Environmental Impact Analysis) and the Land Acquisition and Resettlement Plan (BPK, 2021).”</p> <p>The evidence on the ground shows that AMDAL process in Indonesia face many challenges, including the corruption, lack of transparency, and limited public participation. We propose that existing safeguard or policy integrated in JETP should be monitored thoroughly.</p>	<p>We acknowledge your comment and appreciate the input. We agree that the JT framework has to be monitored stringently to avoid unaddressed issues and accusations of a lack of transparency. Thus, the JETP Secretariat will undertake meta-monitoring, taking an important role alongside lenders and other stakeholders to ensure the implementation phase runs effectively.</p>
16	<p>p.121 The JETP Secretariat, as the coordinator of JETP implementation, would need to crowd in this support</p> <p>To be an effective and independent Secretariat, it has to be equipped with sufficient mandate in the implementation phase. Currently, the Secretariat only serves as the coordinator for the technical implementation of JETP.</p>	<p>We acknowledge your comment and appreciate the input. We will pass your comment to the relevant Government agency (to the extent applicable).</p>
16	<p>p.123 JT Programmatic Approach 3: Thought Leadership for the Just Transition Considering that the Secretariat’s scope of work is very significant and pretty far reaching, it must be able to facilitate clear and deep engagement of all stakeholders, both within and outside the government and IPG. An unclear governance mechanism can pose risks to the implementation of JETP programs.</p>	<p>We acknowledge your comment and appreciate the input. Chapter 9 describes the governance model in detail.</p>
16	<p>(p.125) Monitoring Evaluation: Implement proper and appropriate distribution of funds, and strengthen the IPG’s supervisory function within just transition framework.</p>	<p>We acknowledge your comments and appreciate the input. Kindly refer to Chapter 6.3 for details of monitoring and evaluation, and Chapter 9 for the broader governance structure.</p>
20	<p>p.111. Just Transition Framework – Foundation</p> <p>Koalisi mengusulkan untuk menambahkan aspek inklusi sosial dalam fondasi just transition. Konsep inklusi sosial dapat diintegrasikan dalam</p>	<p>We acknowledge your comment and appreciate the input. Social inclusivity has</p>

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	<p>fondasi hak asasi manusia. Inklusi sosial melibatkan upaya yang disengaja untuk memberikan peluang yang sama bagi individu dari latar belakang yang beragam agar dapat menggali potensi penuh dalam hidup mereka. Konsep ini perlu disebutkan secara eksplisit untuk menunjukkan keseriusan JETP dalam menerapkan pilar no one is left behind.</p>	<p>been addressed in JT Framework - please refer to Annex 10.9 for more details.</p>
20	<p>p139. Pendekatan Program JT 2: Kebijakan untuk Transisi Energi Berkeadilan – Meningkatkan perlindungan sosial. Perlu ditambahkan implementasi aspek remedial justice dan livelihood restoration utk masyarakat terdampak transisi energi.</p>	<p>We acknowledge your comment and appreciate the input. Livelihood restoration has been included in Standard 2: Displacement and Resettlement - please refer to Annex 10.9.</p>
23	<p>Concerns also arise in the social realm, particularly in the identification and analysis of risks at the project level. AEER 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>FPIC underscores the importance of voluntary, informed, and transparent consent from affected communities. AEER highlights the lack of implementation of the FPIC principle at the grassroots level, where communities impacted by energy transition projects remain uninformed and uninvolved in decision-making. Local civil society organizations (CSOs), such as WALHI Jabar, also express their exclusion from the planning process for the early retirement of PLTU 1 Cirebon. Moreover, concerning the implementation of prior and informed consent, AEER urges the inclusion of indigenous communities in the project risk assessment stage, emphasizing the need for careful consideration of the potential impacts on these communities. The absence of a process to identify these impacts raises concerns about the equitable and democratic implementation of projects.</p> <p>The fulfilment of FPIC principles should become a priority in every JETP project. Although the CIPP</p>	<p>We acknowledge your comment and appreciate the input. We agree and the language has been revised in CIPP to include FPIC in our principles for stakeholder engagement - kindly refer to 6.2.2.</p>

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	<p>assumed that these principles were encouraged within the pre-analysis of environmental impacts process (Analisis Mengenai Dampak Lingkungan/AMDAL), the principle itself was often violated as AMDAL became only an administrative formality and remains unaudited nor unevaluated. Therefore, the Government of Indonesia (GoI) and members of the IPG should consider providing an FPIC guideline as a go-or-not-go requirement for project implementation.</p>	
25	<p>(p.109) Regarding the energy trilemma principle faced by Indonesia. This concept emphasizes that a just energy transition needs to consider the principles of energy equity, environmental sustainability and energy security. These three principles are separate spectrums that need to be balanced to achieve a just energy transition. It is understood that this principle is very important and may be difficult to implement because sometimes the spectrum may be opposite to one another. However, there is not much further information about this principle in the document. What is the best strategy to achieve balance across these three spectrums? What programs can be considered for adoption to support the trilemma energy balance? Are there references to good practices from countries or project implementers in meeting the energy demands of the trilemma? What challenges are usually faced in the process of achieving trilemma balance? At what level can we say we have reached a state of balance in the trilemma? Even though this document discusses more technical matters than principal-theoretical aspects, further elaboration of the energy trilemma principle will really help readers, both potential donors, project implementers, as well as professionals, researchers and academics in understanding more in-depth of basic principles as well as a basis for analysis towards a just energy transition.</p>	<p>We acknowledge your comment and appreciate the input. Investments and interventions during energy transition should not focus on just one element but take into account all three aspects of the trilemma. An investment to improve energy security should meet expectations around environmental sustainability, and support energy equity, too – and these elements are directly captured by JETP’s approach to the Just Transition.</p>
25	<p>(p.116) In the assessment section, it is stated that The assessment stage of JT Framework implementation is only performed at the project level and has three components: (i) performing risk identification and analysis, (ii) building risk mitigation actions plan, and (iii) creating plans to enhance opportunities from investments. This process is accompanied by details in Appendix 10.9 which contains an identification table of the risk mitigation program, affected actors, and plans to increase investments. However, the appendix presented is still too general and normative.</p> <p>We suggest we can add several aspects such as details of the actors (who are the main implementers, supporters and specific target beneficiaries), timeline (general estimate of the implementation of the action plan) and the monitoring and</p>	<p>We acknowledge your comment and appreciate the input. This input will be discussed for inclusion in the next version of the CIPP and in the further study on the operationalization of JT Framework Standard 9 as described in Appendix 10.17.</p>

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	<p>evaluation mechanism. This detailing process can indeed become a little more complicated for prospective project implementers, but it is important in order to make the plan more applicable.</p>	
25	<p>(p.125) regarding monitoring and evaluation. In this section, the document presented a general explanation of the MONEV mechanism and how the JETP secretariat processes various monitoring and evaluation results of a meta-monitoring process. However, this section does not discuss much detail regarding the technical monitoring and evaluation of this program.</p> <p>We suggest adding more information Including, who is involved? At what stage and when can monitoring and evaluation be carried out? What is the relationship and coordination pattern between the monitoring and evaluation team from the initiator, donors, JETP secretariat, central government and sub-national governments? A more detailed explanation will provide clarity on the JETP monitoring and evaluation mechanism.</p> <p>Also, we suggest if the document included a mechanism for utilizing technology and system information to support the monitoring and evaluation process.</p>	<p>We acknowledge your comment and appreciate the input. It is expected that this monitoring be shared completely with the JETP Secretariat on a regular schedule for the purposes of meta-monitoring. Responsibility for reporting will also depend on the stakeholders involved: for projects funded by international finance institutions (IFIs), we expect the IFI to share with the Secretariat, while for GFANZ member-funded projects, GFANZ themselves will share. For projects supported by neither of these groups, PLN will take responsibility for sharing this reporting to the JETP Secretariat. MONEV indicators should include disaggregated data and information based on gender, age, income, membership in customary communities, and jurisdictions.</p>
25	<p>(p.122) Driving economic diversification. A clearer understanding of economic diversification will strengthen the argument that various new competitive economic opportunities will be created as a result of a just energy transition and how the trade-offs from this transition can be better paid off.</p> <p>We suggest adding a depiction using a diagram showing the branches of economic opportunities from renewable energy sources to make it easier to understand for the reader and will emphasize that these opportunities are truly extensive.</p>	<p>We acknowledge your comment and appreciate the input. As shown in Appendix 10.17: List of Future In-depth Studies, a study on conceptualizing and operationalizing Just Transition Standard No. 9 will be completed and published with the appropriate further details.</p>

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Chapter 7

Public Submission Number	Comment	JETP respond to comment
1	<p>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>Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Kami telah menambahkan masukan Anda ke dalam CIPP versi 2023 ini pada subbab 6.2.2.1 dan 7.2.1.</p>
4	<p>Echoing the comment in the Executive Summary, P130 mentioned that “allocation of concessional resources should follow the priorities set by this JETP’s five Investment Focus Areas”, yet the allocation of fund for each IFAs does not follow that order.</p>	<p>We acknowledge your comments and appreciate the input. Allocation of fund for each IFA follows criteria as set up in chapter 5, refer to figure 5.3-3.</p>
4	<p>Only USD 138.5 million allocated for grants and only for technical assistance out of a total of USD 20 billion funding. Without additional grants, it’s hard to see how impacts on affected communities can be mitigated.</p>	<p>We acknowledge your comments and appreciate the input. We note that the current proposed grant commitments presented in the JETP CIPP are less than ideal. They are however important to kick start the JETP. As JETP begins implementation, we could explore other sources of grants and that would be reflected in upcoming versions of the CIPP as it is a living document.</p>
8	<p>The debt financing model, whether in the form of concessional loans or commercial loans, raises concerns about the burden of JETP funding on Indonesia’s fiscal space.</p> <p>The additional portion of the grant should be able to cover early retirement for coal-fired power plants, as part of the responsibility of developed countries towards historical debt on climate. Apart from that, developed countries, by the Paris</p>	<p>We acknowledge your comments and appreciate the input. We understand and agree, hence the prioritization of public funding should be used for the most strategic power projects.</p>

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	Agreement, should provide larger grants based on the principle of "common but differentiated responsibilities".	
8	<p>US\$1 billion of US Non-concessional loans raises questions about IPG's commitment to funding with a more affordable cost of financing. amidst rising global interest rates (page 136). Based on the short definition, non-concessional loans are loans typically used for MDBs, with a market-based interest rate and substantially less generous terms than concessional loans.</p> <p>IPG countries should reduce the portion of non-concessional loans, especially when market-based loans for local currency have a 10-year yield of 6.83%, while the US Treasury market yield for 10 years as a risk-free asset is 4.54%. If the US\$1 billion non-concessional is imposed, then the Gol will have to pay annual interest of at least US\$68.3 million to fund the energy transition.</p>	We acknowledge your comments and appreciate the input. The non-concessional US\$1 billion from DFC has its own merits such as potentially longer tenors, TAs, guarantees and/or political risk insurance as well as equity investments. This type of financing is specifically directed to private sector and does not require sovereign guarantee from the government.
8	<p>MDBs Guarantee The United Kingdom and the United States have each committed to providing guarantees for US\$1 billion in support of lending from the International Bank of Reconstruction and Development (IBRD) for this JETP. These guarantees are made available in addition to IBRD's Single Borrower Limit (SBL) for Indonesia. (page134). Although the MDBs guarantee is an alternative way to mobilize funds for the energy transition to developing countries, it has a weak funding commitment, which means that IPG countries do not provide Indonesian funds (escrow account). Lobbying MDBs to provide more guarantees of riskier assets is not new. It has been happening for a long time. The scenario of using MDB guarantees raises concerns about the lack of clarity regarding the technical realization of the IPG direct funding in JETP.</p> <p>Finance IPG must be firmer and have a detailed commitment regarding direct funding from the IPG state budget as well as alternative levies on multinational companies in the fossil sector that operate in Indonesia and create historically many financial benefits for the IPG country</p>	We acknowledge your comments and appreciate the input. The US\$2 billion guarantee from US and UK would leverage the World Bank to increase the vis-a-vis direct lending to Indonesia. However, this guarantee would only be triggered if Indonesia hits its Single Borrowing Limit (SBL). We are currently in discussion with the World Bank and both countries to allow the US\$ 2 billion guarantee to be utilised without Indonesia having to hit the SBL.
8	The EU is not keen to finance early retirement CFPP The EUR 1 billion loan includes sovereign and non-sovereign loans, which financing terms might vary project by project. This loan can be used for all JETP Investment Focus Areas except IFA2 Early Retirement of CFPP (page 139).	We acknowledge your comments and appreciate the input. Each IPG has decided its own funding mechanism.

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	The EU funding commitment for the early retirement of CFPP is very weak and does not provide significant support for Indonesia. The EU can include some of the funds from the CBAM (Carbon Border Adjustment Mechanism), which has the potential to reach EUR 1.5 billion per year until 2028. Some of the funds from the carbon tax in the EU can also be used to fund the early retirement of CFPP in Indonesia.	
8	The Capacity building to raise awareness of ESG investment and standardize sustainability guidelines should be introduced by having public ESG data and impact platforms (page 150)	We acknowledge your comments and appreciate the input.
8	The proposed improvement of THI 1.0 will be aligned at least with the second version of the ASEAN Taxonomy for Sustainable Finance v2 (ASEAN Taxonomy Board, 2023) a common basis to classify sustainable finance in the region. Financing an early phase-out of coal-power plant operations is now being considered as an eligible sustainable activity if the plant's commercial operation period is capped at 35 years, with the expectation that the early retirement effort will facilitate the diversity of the energy transition pathways of ASEAN member countries (page 155).	We acknowledge your comments and appreciate the input.
8	Lack of alternative financing Apart from carbon financing, philanthropy, and banks, the CIPP JETP document does not include potential alternative funding, including the Loss and Damage Fund in financing CFPP early retirement, RE deployment, and just aspects. The revised CIPP JETP needs to include alternative funding potential, especially in the form of a climate debt framework from IPG, which could be loss and damage funds channeled directly to Gol and affected communities.	We acknowledge your comments and appreciate the input. The JETP list of projects are not restricted to a certain type of funding. All funding mechanisms are welcomed.
8	On Project Financial Feasibility: CIPP does not include a fair mechanism if there is an unexpected increase in the cost of new projects (IFA1, IFA3, IFA4) funded using commercial rate loans so that the financial feasibility of the project becomes uncertain. Ensuring the financial feasibility of the projects is essential to protect the welfare of the general public (saving taxpayers money). The general public needs transparency on the financing details since less than 3% of the total fund will be a Grant, while the rest (97%) will be offered as a (commercial) loan. A fair mechanism to ensure the financial feasibility of new projects (IFA1, IFA3, IFA4) should include the willingness of IPG and GFANZ to equally share the burden of any excess cost of the projects by giving grant for 50 percent of the total amount of extra cost. While the Government of Indonesia will absorb 50 percent of the remaining excess cost.	We acknowledge your comments and appreciate the input. The JETP Secretariat will be conducting meta monitoring of financing flows but transactions will be arranged by each respective party. We believe each lender/financier will be conducting its own due diligence to determine project financial feasibility.

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	<p>On Financing Scheme Transparency: As part of transparency, the financing scheme for each project should be announced to the public in addition to the project's financial feasibility. Negotiation on the financing scheme between JETP/Gol and IPG/GFANZ (or other financial institutions) should consider the general public's welfare.</p>	
11	<p>Concerns About the PPA's Bankability: The lack of bankability in the current Power Purchase Agreement (PPA), as well as the utilization of an outdated and potentially less favorable version for the Timor wind farm project Request for Proposal (RFP) – currently ongoing tender process, is a significant concern. The inclusion of concepts like Annual Contracted Energy (ACE) without rollover provisions for shortfalls can introduce uncertainty for Independent Power Producers (IPPs). It's crucial to have a PPA that reflects the realities of variable renewable energy production, which can experience significant annual fluctuations in resource performance.</p>	<p>We acknowledge your comments and appreciate the input. The point raised is fully appreciated and the policy chapter addresses the key bankability issues affecting RE IPPs. We believe it is fundamental that those issues are resolved so that lenders are more comfortable in supporting the country's RES.</p>
11	<p>Integrity in Due Diligence: The financing process for energy projects, whether they are on PLN Priority lists, area focus lists, or RUPTL, demands a high level of integrity in the form of demonstrable progress towards investment readiness. The absence of rigorous integrity checks can jeopardize the bankability of projects.</p>	<p>We acknowledge your comments and appreciate the input. Most of the international commercial banks who are stepping in do adhere to strict due diligence processes. The developers and different stakeholders recognize that they will not be able to get financing lined up unless they adhere to rigorous standards and start working on developing their projects accordingly even at early stages. Similarly the DFIs and the MDBs also support projects which adhere to their DD processes and therefore the projects follow rigorous standards from early stage development.</p>
12	<p>The only comment on financing such a large project is to make sure everything is included. Allow for renewables, building the transmission network to connect them, augmenting the network (batteries and synchronous condensers) to counter low inertia and system strength, and measure inertia along the way in planning and then operationally.</p>	<p>We acknowledge your comments and appreciate the input. We believe it has been mostly addressed in the CIPP via. our 5 IFAs and the technical modelling.</p>
14	<p>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 indebtedness and compromising autonomy.</p>	<p>We acknowledge your comments and appreciate the input. We note your concerns, hence the four financing principles should be upheld and prioritisation of public funding</p>

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		should be used for the most strategic power projects.
16	p 134. Overall energy transition financing is too low (only US\$ 20 out of minimal 150 billion needed); Grant funding is too low (only US\$160 million or 0.8% of the total funding needed); Funding for early retirement of CFPP not attractive to investors; Investment for renewables is unfavorable due to uncompetitive electricity tariffs, also the presence of inhibiting factors (e.g. the Local Content Requirement/LCR). We suggest to renegotiate the existing terms of the funding with the IPG to reflect the actual need.	We acknowledge your comments and appreciate the input. The US\$20 billion is the initial commitment to support Indonesia's Just Energy Transition. As highlighted in the CIPP, there are challenges but they are being targeted through the initial US\$20 billion commitment, with the understanding that the CIPP is a living document and will evolve to help resolve these issues. Further, each IPG has decided its own funding mechanism. Also, the JETP list of projects are not restricted to a certain type of funding. All funding mechanisms are welcomed.
17	It is great to see the CIPP mention that projects that lack commercial viability but have strategic value should be undertaken, if necessary, with public resources alone. What defines strategic in this context? Are projects with low commercial viability but high socioeconomic and environmental impact considered strategic?	We acknowledge your comments and appreciate the input. Please refer to subchapter 5.3.3 on prioritization criteria for projects and programs.
17	The core tenet of the JETPs should be to provide a higher share of grants and concessional financing. So far, most of the grants are earmarked for technical assistance and feasibility studies, not for infrastructure or retirement of coal plants. We strongly believe that the IPG needs to commit to a much higher share of grants to consider this a 'Just' financing package.	We acknowledge your comments and appreciate the input. The current proposed grant commitments presented in the JETP CIPP are important as the kick start of the JETP mandate. As this JETP evolves, additional grant funding could be considered. This JETP could explore other sources of grants and that would be reflected in upcoming versions of the CIPP as it is a living document.
17	As most of the financing is through loans, and needs to be backed by sovereign guarantees, are there plans to assess the JETPs from a debt sustainability point of view?	We acknowledge your comments and appreciate the input. Debt financing that requires sovereign guarantee will be assessed by the ETM Country Platform Steering Committee as regulated in Minister of Finance Regulation No. 103/2023.
17	As the CIPP notes, USD 20 billion will not be enough so new ways to meet Indonesia's targets. Keeping in mind that institutional investors (insurance companies, pension funds, and sovereign wealth funds) together hold about USD 107 trillion in assets, perhaps certain projects under the JETPs can look to tap into	We acknowledge your comments and appreciate the input. We agree with the point raised and kindly note that this US\$20 billion financing package is the initial commitment to

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	<p>there resources: Global landscape of renewable energy finance 2023 (irena.org)). There is a case to be made for higher institutional capital involvement for RE projects, particularly those at the operational/post-construction stage where a number of risks have already been dealt with, including through long-term offtake agreements (PPAs) in place that guarantee stable revenues. This could allow existing financiers to recycle their capital into other, relatively riskier ventures.</p>	<p>support Indonesia's Just Energy Transition. Further, the JETP list of projects are not restricted to a certain type of funding. All funding mechanisms are welcomed.</p>
17	<p>Related to the point above, is there scope to aggregate smaller RE projects under the JETPs into larger tranches to make them suitable for a larger investor base?</p>	<p>We acknowledge your comments and appreciate the input. We agree with the point raised and there are initiatives on the way to aggregate multiple small RE projects across several independent locations (e.g., de diesel projects).</p>
17	<p>Is there a role for philanthropic capital in bridging funding gaps, especially in the access context? For example, for smaller projects that can help address the availability and reliability of access for the last mile (<0.05% of the population)?</p>	<p>We acknowledge your comments and appreciate the input. Absolutely. Please read Philanthropies section in the financing chapter.</p>
17	<p>Seems 60% of the IPG financing will be made available through concessional loans, and this is only available to certain SOEs and SPVs. Will this restrict the ways concessional financing can be used ultimately? In other words, are there areas that need concessional financing, but may only qualify for market rate loans?</p>	<p>We acknowledge your comments and appreciate the input. We agree with the point raised, there are definitely needs for concessional financing for private sectors, especially SME projects.</p>
18	<p>The OECD and OJK convening FGDs on Transition Finance (TF) in Indonesia. The topics include (1) Introduction to the OECD 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. [READ THE DETAILS in attachment]</p>	<p>We highly appreciate OECD's inputs and as the CIPP is a living document we plan to take your valuable feedback into consideration in the upcoming versions of the CIPP.</p> <p>Re. Blended finance - This JETP leverages on DFI Enhanced Blended Concessional Finance Principles for Private Sector Projects. We believe utilization of blended financing should ensure that concessional financing is used in a catalytic way, that would crowd-in commercial financing to a strategic project that would otherwise be deemed as not bankable.</p> <p>Re. Industry decarbonization - the upcoming versions of the CIPP will include energy efficiency and electrification analysis as a new JETP working group on this will be formed. Its</p>

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		tasks will include assessing and tackling the energy efficiency issues especially for industry decarbonization. A more detailed captive power system study will also be conducted to find possible alternative pathways to develop a viable decarbonization plan for the off-grid captive power system.
20	p148. (modalitas keuangan dalam pembiayaan): penggunaan dana publik dalam skema JETP. Penggunaan dana publik perlu diawasi dan harus dipastikan agar tidak menambah beban negara (dalam bentuk utang maupun alokasi APBN untuk 'menalangi' kekurangan dana proyek, sebagai contoh proyek kereta cepat Bandung Jakarta).	Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Kami memahami kekhawatiran Anda, oleh karena itu empat prinsip pembiayaan yang telah kami elaborasi di dalam CIPP harus dijunjung tinggi dan prioritas pendanaan publik harus digunakan untuk proyek-proyek listrik yang paling strategis.
20	p167. Rincian Pendanaan IPG Berdasarkan Peruntukannya <ul style="list-style-type: none"> • Porsi pembiayaan dari IPG yang bersumber dari grant sangat kecil. • Indonesia perlu melakukan renegotiasi kepada IPG terkait porsi pembiayaan. Skema grant yang sangat kecil menunjukkan rendahnya komitmen negara maju untuk membantu negara berkembang dalam transisi energi, padahal dari sisi sejarah, negara majulah yang mengeluarkan emisi lebih besar.	Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Kami sependapat bahwa porsi hibah memang kecil jika dibandingkan dengan total komitmen pendanaan IPG. Mohon diperhatikan bahwa paket pembiayaan sebesar US\$20 miliar ini merupakan komitmen awal untuk mendukung Transisi Energi Berkeadilan di Indonesia. Kami selalu terbuka untuk komitmen pendanaan lainnya.
20	p174 - 175. Penyelarasan Taksonomi Berkelanjutan Indonesia dan JETP: <ul style="list-style-type: none"> - JETP punya kebutuhan untuk taksonomi yang lebih jelas - Private financing akan banyak menyasar perbankan, baik yang tergabung dalam GFANZ dan perlu memperluas cakupan pada bank komersial lain (karena kebutuhan pembiayaan transisi energi lebih dari USD 20 billion). - JETP menjadi peluang bagi perbankan komersial mengambil peran untuk turut mendukung upaya mitigasi dan adaptasi perubahan iklim. Taksonomi menjadi guidance/tool yang dapat membantu perbankan. Kedua hal ini saling berkaitan dan perlu selaras untuk mencapai tujuan yang sama. - Taksonomi dapat memperkenalkan kewajiban untuk: 1) memiliki kebijakan lingkungan, sosial, dan tata kelola di internal pelaku usaha sektor keuangan; 2) melaksanakan uji tuntas HAM/human rights due diligence; 3) mengatur keterbukaan informasi dalam laporan keuangan berkelanjutan; dan 4) kewajiban melaksanakan grievance mechanism dan perbaikan lingkungan yang rusak atas 	Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Kewajiban yang disebutkan pada no. 1-4 ini sudah termasuk di dalam JT Framework sesuai pada bab 6 di CIPP ini. Standar-standar tersebut juga merupakan aktivitas yang sudah biasa dilakukan oleh MDBs/DFIs yang menjadi entitas intermediasi di dalam penyaluran pendanaan JETP. Taksonomi Indonesia hingga saat ini belum menjadi sebuah kewajiban namun masih bersifat voluntary. Taksonomi adalah ranah

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	<p>pembiayaan kotor.</p> <ul style="list-style-type: none"> - Taksonomi Indonesia v1 saat ini sedang dilakukan pemutakhiran oleh OJK. JETP bisa menjadi bahan intervensi perbaikan taksonomi Indonesia v2 dengan memberikan gambaran sektor usaha hijau dan berkelanjutan (sektor energi). - Masuknya pensiun dini PLTU batu bara dalam ASEAN taksonomi dapat menjadi acuan updating taksonomi Indonesia. Catatan untuk hal ini adalah perlu adanya timeline yang jelas untuk pensiun dini. Misal untuk kategori hijau adalah pensiun dini PLTU yang ditargetkan akan berhenti di tahun sekian. Jangan sampai terjebak dalam greenwashing dan memberikan solusi palsu untuk transisi energi. - Pengkategorisasian hijau, kuning maupun merah, memerlukan definisi dan kriteria maupun batasan yang jelas dan mendetail, disertai cut-off time yang jelas. Ketika suatu aktivitas di label sebagai “kuning” mereka harus memiliki time-bound commitment yang jelas tentang kapan aktivitas tersebut akan bertransisi menuju hijau. - Kondisi di lapangan menunjukkan bahwa kebijakan maupun implementasi kebijakan di sektor swasta masih perlu perbaikan. - Riset Bank Assessment – Koalisi ResponsiBank Indonesia menunjukkan komitmen perbankan swasta pada tema perubahan iklim, maupun pembangkit energi masih rendah. Belum ada peta jalan dari perbankan secara konkrit untuk net zero, masih bergantung pada pembiayaan energi fosil, dll. Di lapangan, masih banyak dampak buruk lingkungan maupun sosial yang terjadi, terutama di sektor berisiko tinggi seperti perkebunan dan pertambangan. - Indonesia telah memiliki regulasi yang mendukung SF, diantaranya: <ul style="list-style-type: none"> o UU P2SK yang perlu diperkuat dengan peraturan2 selanjutnya. o Roadmap Keuangan Berkelanjutan Tahap 1 dan 2 o POJK 51 tentang implementasi keuangan berkelanjutan, diikuti dengan Pedoman Teknis o POJK 51, wajib untuk lembaga jasa keuangan, emiten, investor. o POJK Nomor 18 Tahun 2023 tentang Penerbitan dan Persyaratan Efek Bersifat Utang dan Sukuk Berlandaskan Keberlanjutan (POJK 18/2023) o Buku Acuan Kredit Pembiayaan Sektor Sawit o Taksonomi Hijau – masih berlaku voluntary, OJK saat ini juga masih mengembangkan sistem pelaporan penyelarasan taksonomi hijau dan portfolio pembiayaan perbankan. - Beberapa peraturan yang perlu dikembangkan oleh OJK: buku acuan kredit/pembiayaan untuk sektor pertambangan (merespon banyaknya pelanggaran lingkungan, HAM, dll di sektor nikel). 	<p>dari OJK, tapi kami turut mendukung pemutakhiran taksonomi terbaru Indonesia yang sedang disusun oleh OJK. Kami mencatat masukannya dan akan kami sampaikan kepada OJK.</p>
20	<p>p174 - 175. Penyelarasan Taksonomi Berkelanjutan Indonesia dan JETP</p> <ul style="list-style-type: none"> - Updating taksonomi v2 menjadi peluang bagaimana SF diakselerasi, ada peluang implementasi. Taksonomi bisa menjadi petunjuk untuk prasyarat private finance 	<p>Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Prasyarat untuk sebuah proyek untuk mengakses</p>

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	<p>masuk ke dalam pembiayaan JETP. Prasyarat ini seharusnya bersifat mengikat.</p> <ul style="list-style-type: none"> - Taksonomi perlu diterapkan secara mandatory. - Dampak sosial dalam proses transisi perlu menjadi perhatian dari investor. Safeguard, due diligence, mekanisme akuntabilitas perlu diterapkan dengan baik. 	<p>pendanaan JETP sudah diterangkan di subbab 5.3.3 CIPP.</p>
20	<p>p174 - 175. Penyelarasan Taksonomi Berkelanjutan Indonesia dan JETP</p> <ul style="list-style-type: none"> - Skema monitoring dan evaluasi pembiayaan JETP perlu lebih jelas: indikator, means of verification, aktor yang terlibat dalam proses monitoring dan evaluasi. Gugus tugas untuk money diperlukan dan perlu melibatkan multi-stakeholder. - Proses grievance mechanism juga perlu disampaikan secara lebih jelas dalam dokumen ini (dapat berupa grafik alur), bagaimana mekanisme resolusi permasalahan yang ditawarkan oleh JETP. 	<p>Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Grievance mechanism juga akan dibuka website JETP: jetp-id.org.</p>
20	<p>p174 - 175. Penyelarasan Taksonomi Berkelanjutan Indonesia dan JETP</p> <ul style="list-style-type: none"> - Sekretariat JETP perlu memikirkan skema untukantisipasi adanya proyek yang tidak menguntungkan. Jangan sampai ini menjadi beban bagi negara untuk harus menanggung kerugian dan melimpahkannya kepada masyarakat dengan menaikkan pajak, dll. 	<p>Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Kami memahami kekhawatiran Anda, oleh karena itu empat prinsip pembiayaan yang telah kami elaborasi di dalam CIPP harus dijunjung tinggi dan prioritas pendanaan publik harus digunakan untuk proyek-proyek listrik yang paling strategis.</p>
20	<p>p174 - 175. Penyelarasan Taksonomi Berkelanjutan Indonesia dan JETP</p> <ul style="list-style-type: none"> - Skema pembiayaan JETP perlu memasukkan pembiayaan proyek energi bersih skala kecil. Rekognisi bagi masyarakat lokal untuk menghasilkan energi bersih perlu dilakukan. Skema pembiayaan ini bisa dimasukkan dalam kategori pembiayaan transisi berkeadilan dalam bentuk grant. 	<p>Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Kami setuju dengan poin anda dan ada beberapa inisiatif yang sedang dilakukan untuk mengumpulkan beberapa proyek energi terbarukan kecil di beberapa lokasi independen (mis., proyek-proyek de-diesel).</p>
20	<p>p177. Peran Lembaga Keuangan Domestik</p> <p>Perlu adanya penjelasan detail terkait dimana bank domestik dapat berperan. Dalam dokumen dijelaskan bahwa bank domestik sudah memiliki minat dan arah untuk pembiayaan transisi energi. Ini perlu diperjelas dimana perannya, apakah untuk pembiayaan pensiun dini, pembiayaan energi terbarukan, pembiayaan transisi energi, dll? Perlu dibuat ketentuan bagaimana perbankan domestik menunjukkan kinerja baik untuk menerapkan just principles dalam pembiayaan yang dilakukan. Lembaga keuangan juga dapat mengambil peran untuk mendampingi agar proyek energi bersih skala komunitas menjadi bankable.</p>	<p>Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Kami berpendapat bahwa lembaga keuangan domestik dapat memiliki peran di lima bidang investasi JETP. Namun sejauh ini pemetaan kami menunjukkan bahwa minat lembaga keuangan domestik lebih banyak di IFA 1, 3, 4 dan 5, sedangkan IFA 2 selain dari INA dan PT SMI masih belum banyak menarik minat mereka. Kami harapkan dengan versi THI terbaru bisa menambah minat lembaga keuangan domestik pada aktivitas yang</p>

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		berhubungan dengan transisi energi termasuk IFA 2.
22	<p>(1) Strengthening existing frameworks to increase the responsible use of concessional finance in Indonesia: As is known in Indonesia, building capital stacks with layers of concessional finance as already been successfully employed in Indonesia to fund development projects.¹ However, in order to ensure that there is a truly scaled approach (instead of an expensive, transaction-by-transaction approach) to mobilising concessional finance, a clearer policy framework regarding future financing regulatory steps, transparency in governance mechanisms surrounding the financing of projects, and clarity on contracts, terms, enforcement and other clauses is required.</p>	<p>We acknowledge your comments and appreciate the input. Contributions to the Indonesian JETP include at least US\$10 billion in public sector pledges in the CIPP. As highlighted, this JETP is following the tried and tested governance procedures that have been utilized and also conforms to the governance and fiduciary responsibilities of the partnering agencies. As the CIPP is a living document this will also be updated if needed.</p> <p>Regarding transparency in governance mechanisms the JETP Secretariat will be doing meta monitoring for financing flows that will be uploaded in the website: jetp-id.org. For further governance issues, refer to Chapter 9 of the CIPP.</p>
22	<p>(2) Technical Assistance to meet the ESG Standards of financing: For European DFI debt or equity, financing must adhere to the EU taxonomy and its standards. This takes considerable technical assistance in order to make projects even reach a minimum threshold before officially entering a DFI's pipeline or due diligence process. Even for other MDBs and non European DFIs, regulation in host international countries is becoming more complex, requiring compliance from downstream projects in countries like Indonesia. While MDBs and DFIs will provide some TA alongside an investment, this is usually after an investment has passed the investment committee (IC) stage. So, there is almost little to none TA for the minimum ESG standards of financing to be met. This will significantly slow down the number of projects that reach the IC stage of DFIs (let alone international commercial financing). The amount of TA available as stated in the document is already earmarked for existing projects, but not for say new RE projects, and it assumes that DFIs will pay for getting these projects up to the final level of compliance required for safeguards (which as stated, is only for those projects for which DFIs have some kind of deal memo with; not for pre-IC projects). We believe it is thus essential to solve this quickly: all DFIs should come together to deliver a ESG standards training programme based on the relevant (EU or other taxonomy) as appropriate. We understand that GFANZ and IPG members have assisted the JETP Secretariat in providing a variety of support on RE project preparation</p>	<p>We acknowledge your comments and appreciate the input. Most of the international commercial banks who are stepping in do adhere to strict ESG guidelines and standards (e.g. the Equator Principles based on IFC Performance Standards). The developers and the different stakeholders recognize that they will not be able to get financing lined up unless they adhere to these standards and start working on developing their projects accordingly even at the early stage. Similarly the DFIs and the MDBs also support projects which adhere to their E&S safeguards and therefore the projects follow these standards from early stage development.</p> <p>We welcome your inputs as well as your support in the Indonesian JETP implementation phase including any</p>

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	<p>support and of course there are online ESG toolkits and trainings provided by DFIs. However, in our experience, on-the-ground, site-visit-based trainings are required to translate online materials into real understanding on the ground by project owners and developers. We would highly recommend investing in this capacity building as early as possible, given the time it takes to develop projects.</p>	<p>assistance you can provide in capacity building and TAs for our projects.</p>
22	<p>(3) Improve outreach to non-traditional concessional providers: Our experience also shows that engaging with MDBs and DFIs solely to mobilise concessional financing can take a lot of time. Our experience also shows that there is a large world of non-traditional, philanthropic based concessional finance providers that are not widely known. We would thus recommend more effort on outreach to concessional providers of financing, including grant, below market-rate financing, first-loss pool providers and technical assistance providers. As a first step, we suggest reaching out to Convergence, a network of concessional providers as well as Rockefeller Foundation and others.</p> <p>We would also recommend the JETP Secretariat to further coordinate traditional bilateral donor aid programmes to direct further grants that specifically catalyse DFI and commercial financing within the JETPs (of course, without taking away from other donor aid programmes to Indonesia). We understand that outreach to a variety of donors, philanthropic organisations and other non-traditional concessional finance providers will entail coordination costs, especially in the beginning. However if resources can be found for such a person, we recommend that there is a dedicated point person within the JETP Secretariat to reach out to such philanthropic donors with say, annual targets of \$50 mn in mobilising such non-traditional concessional resources..</p>	<p>We acknowledge your comments and appreciate the input. The JETP Secretariat has started the engagement to other non-concesisonal providers including philanthropies.</p> <p>We welcome any assistance you can provide as per your suggestions.</p>
22	<p>(4) Common transaction templates that reduce costs and increase the speed of co-financing processes, especially with Indonesian finance providers: For the MDBs and DFIs, learning how to co-finance or syndicate with common transaction templates and particularly with local banks is essential. Experience shows that MDBs and DFIs rarely co-finance (though they do engage in follow-on financing after a first anchor investment from an MDB has been made). This creates tremendous due diligence, compliance and reporting costs for the borrowing entities. The DFIs and MDBs should attempt a common transaction template in financing certain projects within the JETP, and one that allows them to co-finance or syndicate loans. As was discussed in ESCAP's JETP event, common transaction templates with agreed-upon risk, contingency, dispute clauses can also be adopted amongst international private banks, and would save a lot of time and money for those seeking to finance JETP projects. The secretariat should see what can be done about sharing such templates and we believe that some international</p>	<p>We acknowledge your comments and appreciate the input. We will consider if such approach can be utilised to speed up procurement of JETP projects and shorten financial close period.</p>

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	commercial lenders would welcome such templates. Finally, if the DFIs and MDBs can even co-finance with local banks, a lot of hedging risk may be overcome. This should be a final (if far away) goal.	
22	<p>(5) Strengthening existing databases for ESG metrics in Indonesia: Data portals on ESG standards contextualised for Indonesia in the sector is essential. Whether it is for RE, CFPPs, or other projects; financing these projects and meeting compliance standards needed to meet various investor standards is essential as discussed. However data, and benchmarks need to be widely accessible to the whole sector in Indonesia, and easily understood. A portal similar to Singapore's Project Greenprint (but smaller in scope and perhaps relevant only to the energy transition in Indonesia) which allows various data providers to 'talk' to each other with their own data rather than imposing one format for data in one portal is extremely worthwhile and may be able to be provided by a donor.</p>	We acknowledge your comments and appreciate the input. The CIPP aims to adopt the best practices which are fit for purpose from more mature markets and will continue to assess recommendations on an ongoing basis as the CIPP is designed as a living document.
22	<p>(6) Training Indonesian banks and asset managers to better assess and finance energy transition projects, thus mobilising more local financing that does not need to be hedged. Overall, private sector interest in renewable energy projects has been growing, with local and international companies investing in solar farms, wind energy, hydropower, geothermal, and biomass projects. The primary financing source for banks for the JETP. However a major bottleneck to moving quickly in terms of mobilising local finance is also ensuring that local banks and their lending staff are well trained in assessing the risks, standards (ESG) and pricing of energy transition projects (including new technologies).</p> <p>In addition, as the section on GFANZ' transition planning lays out; helping senior leadership and the boards of local banks to begin adopting transition planning will ensure that decisions at the top are able to be executed by staff below if they are trained well in doing such deals. Since concessional finance is also envisioned to be part of these capital stacks, training bank lending staff in corporate finance and project finance to also co-finance a capital stack with different layers is essential.</p>	We acknowledge your comments and appreciate the input. We welcome any assistance you can provide as per your suggestions.
22	<p>(7) Ensure that small-ticket projects are not overlooked: While the document is focused on the most immediate priority projects, we also would like to highlight that it is important that small ticket projects (especially those in the \$5-15mn range) are not overlooked and nurtured, especially if they are proof of demonstration of larger concepts (e.g. in new technologies, or off-grid RE) or in more challenging areas (and thus perhaps more 'just' or more 'equitable'). Outreach to project preparation funds for such small ticket projects is also key and again, perhaps a role for donors such as USAID/FCDO/GEF/GCF and many others can play a role in nurturing such projects to investment stages. We understand that there are of course significant coordination costs in doing so and perhaps this is also an area that other bilateral</p>	<p>We acknowledge your comments and appreciate the input. We agree with the point raised and there are initiatives on the way to not only ensure small ticket projects are not overlooked, but also to aggregate multiple small RE projects across several independent locations (e.g., de diesel projects) to improve bankability and minimise coordination costs.</p> <p>We have incorporated this into subchapter</p>

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	aid programmes can be directed to look into, with oversight from the JETP secretariat.	6.2.2.1 and 7.2.1. We welcome any assistance you can provide as per your suggestions.
22	(8) Ensure a focus on consistency, convergence and interoperability between sustainable finance taxonomies: The focus on transition taxonomies is welcome and particularly in alignment with the ASEAN Taxonomy as well. Again, any attempts at convergence between Indonesian taxonomies in green or transition and global taxonomies will make the costs of interoperability for international and also domestic investors much lower.	We acknowledge your comments and appreciate the input. We fully agree on the point made. The JETP Secretariat is supporting OJK on its revision for the Indonesian Green Taxonomy as a way forward to adopt transition activities to the taxonomy, in line with ASEAN Taxonomy V2.
22	(9) Advocate for better corporate governance: As we know from experience, the role of perceptions also plays a role in defining risk premiums and pricing worldwide. If the JETP secretariat can play a role in disseminating positive perceptions about the state of good corporate governance in Indonesia, the perceptions of risk will reduce and the readiness to invest (by international investors will also grow).	We acknowledge your comments and appreciate the input. We advocate the same and are inclined to think that this will help Indonesia move towards better practices.
22	(10) Clarify screening criteria for sovereign guarantee: The JETP draft mentions that projects will be assessed based upon criticality. The absence of a specific definition of the term “Criticality” in the draft JETP may prevent the rapid mobilization of financing. Therefore, a clear definition of the term “criticality” would create transparency for all investors.	We acknowledge your comments and appreciate the input. We have clarified this in the 2023 version of the CIPP in subchapter 7.2.2.
23	The financial landscape of the JETP scheme raises crucial concerns, particularly regarding the composition of funding mechanisms. AEER 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 nonconcessional loans carrying the obligation to repay debts at global market interest rates. The reliance on private funding, including contributions from the Glasgow Financial Alliance for Net Zero (GFANZ), introduces a layer of uncertainty. The favorable disposition of international financial institutions toward non-concessional loans may lead to increased private funding, potentially undermining the financial commitments of International Partners Group (IPG) countries. Despite the existence of Multilateral Development Bank (MDB) guarantees, the indirect nature of these guarantees, coupled with the conditions tied to the International Bank of	We acknowledge your comments and appreciate the input. We note your concerns, hence the four financing principles should be upheld and prioritisation of public funding should be used for the most strategic power projects and to crowd in private finance. The US\$ 2 billion guarantee from US and UK would leverage the World Bank to increase the vis-a-vis direct lending to Indonesia. However, this guarantee would only be triggered if Indonesia hits its Single Borrowing Limit (SBL). We are currently in discussion with the World Bank and both countries to allow the US\$ 2

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	<p>Reconstruction and Development's Single Borrower Limit (IBRD SBL), adds complexity to the funding dynamics. The availability of an additional \$2 billion is contingent on Indonesia reaching its SBL, highlighting the intricacies and conditions of international financial support.</p> <p>In navigating the financial risks of JETP, Indonesia finds itself at the intersection of historical responsibility, complex funding mechanisms, and the imperative for a sustainable energy transition. Striking the right balance between attracting necessary funds and safeguarding the national budget requires nuanced policy decisions and vigilant risk-management strategies to ensure the success of JETP and, by extension, Indonesia's energy transition journey.</p>	<p>billion guarantee to be utilised without Indonesia having to hit the SBL.</p>
24	<p>Making more efficient use of funding available Implementation of the CIPP would benefit from external financiers consolidating their currently fragmented funding facilities and vehicles (refer to Table 7.4-1). The dizzying array of loan, guarantee and grant facilities, some provided in comparatively miniscule sizes, makes effective and scalable implementation of the CIPP very challenging for the Government of Indonesia.</p> <p>There are numerous pre-existing funds/vehicles that have been identified as being allocated to the IPG's funds contribution. It is difficult to see how these funds are additional to those that might have already been available to Indonesia outside JETP. The challenge of mobilizing funds from these trust facilities and vehicles is that each one may have its own requirements for application, qualification, approval, disbursement, monitoring and reporting. Often these hurdles exist even for comparatively miniscule amounts of money. The Government of Indonesia has been placed in an unenviable position of being forced to sort through all of these packages and attempt to make sense of whether or not money will be available, when they might be able to expect it to be available, and for what that money could be used for.</p> <p>Given the sheer scale of funding required to implement even the start of Indonesia's JETP, there is great need for financial support to be pooled. The fragmented and qualified nature of many of the financing sources does not lend to a smooth implementation of the CIPP. Pooled funds will allow the government and people of Indonesia to implement their plan in the way they see it best working.</p> <p>There shouldn't be individual hoops, tests and processes for each and every little morsel of funding, which is the way it appears to be offered now. That not only makes the implementation process inefficient, it serves to further delay the</p>	<p>We acknowledge your comments and appreciate the input. As these different funds are currently being managed by different agencies with their own governance and fiduciary responsibilities, they need to be managed with their own protocols and governance structures in coordination with the Indonesian counterpart agencies/ stakeholders.</p> <p>For funds that have been allocated to specific projects please refer to respective descriptions under each IPG country's contribution.</p> <p>As the JETP evolves, it may explore the points mentioned.</p>

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	<p>overarching goal of the JETP in the first place: rapid decarbonization.</p> <p>There will be a need for incredible organization and coordination within the Government of Indonesia in order to tap these myriad facilities. Pooling and centralization of funding, allocations and disbursements would greatly aid in assuring efficiency and effectiveness. Such centralization and oversight would aid funders, investors and government alike.</p>	
24	<p>Guarantees would benefit from being pooled. Similar to debt and TA funds, guarantees should be pooled and made available to mobilize and maximize commercial finance. Guarantees offer one of the best ways to mobilize the large amounts of private sector capital that will be needed to see the CIPP realized. Guarantees can target specific categories of risk that the private sector has difficulty with – particularly if new, untested policies are implemented or certain political/government risks remain. Having a material and meaningful volume of guarantees available will induce more private sector parties to participate while lowering the cost of financing. Guarantees could be at the core of realizing lower cost “blended finance”.</p> <p>Having a large pool of guarantee monies to support project level investment or portfolio investments in CIPP would allow progress at scale. Currently guarantees are not only fragmented, but potentially not fit for purpose. Pooling, ideally with centralized coordination, would allow the Government of Indonesia to implement its CIPP, rather than, say, pre-identified projects that outside, bilateral agencies favor.</p> <p>Currently the two biggest guarantee sources, at US\$1bn each, come from the United States and the United Kingdom. This equates to 20% of the monies pledge by governments in the IPG. However, their conditions for use are both indirect. The UK and US guarantees are offered to the World Bank – not to the Government of Indonesia – in order to extend the World Bank’s lending headroom to the country. The rationale for this is that, with so many activities being proposed under the CIPP where World Bank might be a funder, there is potential that the World Bank treasury might exceed its prudential lending limit, or single borrower limit, for Indonesia. Indonesia borrows from the World Bank for myriad development needs: education, health, transportation, and including some for energy. Currently, the Government of Indonesia has outstanding dues to World Bank of \$2.75bn with another \$6.57bn committed but as of yet undisbursed (ref). While it is beneficial to have more World Bank Group funds available for JETP, at the same time, conditions should be created such that those guarantees are used first for qualified JETP investments and should avoid Indonesia using up its current single borrow limit for ordinary World Bank supports to the country. Indonesia requires the</p>	<p>We acknowledge your comments and appreciate the input. Indeed, to catalyze capital flows into and within Indonesia for eligible projects, MDBs and DFIs can extend guarantees for eligible projects which enable financing partners to transfer certain risks that they cannot easily absorb or manage on their own to such MDBs and DFIs. The current proposed guarantee commitments presented in the JETP CIPP are important as the kick start of the JETP mandate. As this JETP evolves, new forms of guarantees could be considered.</p> <p>We are currently in discussion with the World Bank and both countries to allow the US\$ 2 billion guarantee to be utilised without Indonesia having to hit the SBL.</p>

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	flexibility to still access World Bank programs for its many uses outside of JETP without hinderance.	
26	-Including MDBs and DFIs staff in the JETP could potentially help to increase the conversion ratio of priority projects to funding by those organisations	We acknowledge your comments and appreciate the input. The JETP Secretariat closely works with intermediary MDB and DFI staff.

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Chapter 8

Public Submission Number	Comment	JETP respond to comment
1	<p>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.</p> <p>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>	Terima kasih usulan Anda. Kami akan teruskan usulan ini ke pemerintah. Sebagai informasi, perihal GEDSI sudah diintegrasikan kedalam Just Transition Framework Standard 3 yang telah dipaparkan dengan lebih lanjut di Bab 6.
4	The JETP CIPP successfully managed to identify key roadblocks to the development of renewable energy in Indonesia and proposed a comprehensive set of policies, both tailored for short- and medium-term implementation. Some of the crucial initiatives included are a relaxation of local content regulation for priority projects, removing price caps on coal, and providing de-risking packages during the bidding stage through PLN assistance in land procurement. If successfully implemented, it will go a long way in accelerating the currently slow uptake of renewable energy	We acknowledge your comments and appreciate the input.
4	Given that PLN is given such a central position in the CIPP, the JETP Secretariat should ensure an absolute level of buy-in from PLN on the plan described in this CIPP. Failure to obtain this creates a risk that the plan may be derailed or slowed down.	We acknowledge your comments and appreciate the input. We are working with PLN closely, from building CIPP until implementation stage.
4	Additionally, the JETP CIPP also emphasizes the significance of aligning project pipelines between the National electricity Plan (RUKN) and PLN's Electricity Business Plan (RUPTL), as well as improving coordination among various government departments. Despite these positive aspects, the fact that the JETP CIPP is not considered to be a legally binding document raises some concerns. Without having any legal enforcement of the document, the multi-year reforms and deals could be at risk every time there is a new change of administration, as there is no legal obligation for them to carry through the commitment. For the next step, it would be beneficial to explore the possibility of translating the JETP CIPP into a	We acknowledge your comments and appreciate the input. JETP Secretariat is not a government agency and does not represent any such agency. Therefore, the CIPP is not a policy document. The CIPP is a strategy document that can be used as a recommendation to the Government of Indonesia for power sector planning and policymaking as part of the JETP process.

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	legislation, similar to commitments made under the Kyoto Protocol and the Paris Agreement.	
8	Regarding Retirement and Managed Phased-out. Full comment in attachment.	<p>We acknowledge your comments and appreciate the input. The JETP model has 3 scenarios: (1) early retirement of 5.2GW + 1.7GW capacity, (2) 1.7GW capacity, and (3) no early retirement. In addition, the coal flexibility will be adapted.</p> <p>Furthermore, the Government of Indonesia is in the process of finalising a roadmap for early coal retirement which would include certain criteria to develop a suitable CFPP early retirement pipeline.</p>
8	<p>Strengthening Domestic Supply Chain of Renewable Energy by Reforming Local Content Requirement (LCR):</p> <p>Transition energy also means reducing dependency on extractive sectors. It is important not only for PV waste, but other e-waste programs must be expanded to all components requiring critical minerals (nickel, bauxite, etc). It needs to be stated clearly the recycling target in the CIPP JETP. For instance, 15-20% of solar PV components and EV batteries will come from recycling in 2030. As a comparison, the EU Critical Mineral Act plan states an effort to reach at least 15% of the EU's annual consumption for recycling in 2030.</p> <p>Apart from clear targets, it is necessary to encourage fiscal and non-fiscal incentives to increase domestic capacity in encouraging the recycling industry.</p>	<p>We acknowledge your comments and appreciate the input. We have included the safe disposal and recycling of RE waste including e-waste within Sub-chapter 8.1.5.</p>
8	DPO: There needs to be caution in eliminating coal DPO, and it would be better to reform policy by eliminating coal DPO through a more in-depth study process.	<p>We acknowledge your comments and appreciate the input. We will continue to support the GoI on an analytical capacity as steps are taken for DPO reform.</p>
8	<p>Procurement Processes Improvement: Bolder fiscal reforms that need to be implemented in the short term by reallocating incentives and spending on energy subsidies, implementing a windfall profit tax for fossil companies. At the same time, the GOI can increase fiscal space by implementing a carbon tax. Without bold fiscal reform, it is difficult to hope that fiscal space will be available while providing incentives for the RE sector to achieve the 44% energy mix target in 2030.</p>	<p>We acknowledge your comments and appreciate the input. The proposed reform in subchapter 8.2.3. is based on the same concept of recycling windfall profit of coal producers to enable a higher uptake of renewable energy by PLN. This reform proposes that the funds collected in this scheme is used to keep power tariffs affordable by compensating PLN on potential increase in power generation costs, either due</p>

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		to increased coal market price or RE technology costs.
8	Unclear Legal Framework: The governance and scenario for the Accelerated Termination of the CFPP Operational Period Program in the CIPP file still uses Presidential Decree 112/2022 which is normatively problematic. Full comment in attachment	We acknowledge your comments and appreciate the input. We will communicate this to the relevant GoI entities. Currently, the MEMR is preparing regulations relating to the roadmap for early retirement of CFPPs.
8	On Local Government Involvement: JETP has not discussed the position of local government in the planning process, project selection, and mitigating socio-economic and environmental risks from the energy transition.	We acknowledge your comments and appreciate the input. Local governments are embedded in current energy planning processes and furthermore will be involved in the procurement process with project developers, as stipulated in current procedures. JETP Secretariat will disseminate the CIPP to local governments so that they can support projects that will be built in their jurisdiction and support to mitigate socio-economic and environmental risks from energy transition as per discussed in the JT framework.
11	Importance of Pre-Qualification Process: The project procurement process at PLN plays a critical role in ensuring the selection of capable and reputable IPPs for renewable energy projects. At present, there is no pre-qualification step. A pre-qual process is essential to ascertain the qualifications and readiness of IPP candidates before they can proceed to the tender process.	We acknowledge your comments and appreciate the input. Pre-qualification has been conducted by PLN. Any inputs for improvement will be passed to PLN.
11	Recommended Requirements for the Pre-Qualification Process: resource assessment, permit status, transportation and logistics, land status, stakeholder engagement, feasibility study. Full comment in attachment.	We acknowledge your comments and appreciate the input. We will pass your comment to the relevant Government agency and to PLN (to the extent applicable).
11	De-Risk Bidding Packages One of the policy enablers for enhancing the procurement process of Renewable Energy is the proposal to de-risk bidding packages, involving PLN's assistance in land procurement. However, this concept may not be appropriate. The proposed concept of having PLN assist in land procurement is not, in our opinion, a suitable approach. This is primarily due to several key factors: lack of	We acknowledge your comments and appreciate the input.

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	<p>skills and resources, inability to deliver bankable land certification, ill-considered concept.</p> <p>Full comment in attachment.</p>	
11	<p>Bankable Power PPA The proposal to make Power Purchase Agreements (PPAs) bankable by employing standardized templates and clauses with appropriate risk allocation, which have undergone market testing, is a crucial policy enabler. For wind farm projects, we suggest adopting the Sidrap and Tolo Wind Farm PPA template (1.0) for wind farm projects. These templates have demonstrated their bankability with a proven track record of success. They are widely accepted and have faced minimal disputes, making them reliable choices for the industry. It is pertinent to question the necessity of a 2.0 version of the PPA template. The introduction of a 2.0 version, as seen in the Tanah Laut PPA process, has led to extensive renegotiations. This not only adds complexity to the process but also introduces uncertainties. However, issuing a PPA for projects like Kupang without the 2.0 version attached creates challenges for bidders, forcing them to revisit negotiations and potentially restart negotiations from scratch. For projects of a size similar to 22MW, the additional costs and delays associated with reworking negotiations can be burdensome.</p>	<p>We acknowledge your comments and appreciate the input. The PPA standardisation is one of the policy recommendations in the CIPP. For more information, please refer to Chapter 8.4 of the CIPP.</p>
11	<p>Benefits of Implementing Specific Pre-Qualification Requirements: Introducing these specific requirements into the pre-qualification process can help ensure that only highly qualified IPPs with robust and viable projects are allowed to participate in the bidding. This reduces the risk of delays, enhances project quality, and aligns the process with internationally accepted standards. Moreover, it aids PLN in its power planning process by streamlining the procurement process, ultimately benefiting the energy sector and the nation as a whole.</p>	<p>We acknowledge your comments and appreciate the input. This is one of the policy recommendations in the CIPP. For more information, please refer to Chapter 8.3 of the CIPP.</p>
11	<p>OSS SYSTEM The adoption of a risk-based Online Single Submission (OSS) system for business licensing emphasizes the importance of facilitating ease of doing business. The principles of business licensing aim to make the process certain, easy, efficient, and transparent. However, despite these intentions, the practical implementation of the OSS system in Indonesia is encountering several challenges that must be addressed for the system to operate smoothly and deliver the anticipated benefits: regulatory complexity, lack of coordination between institutions, appointment of a PIC.</p> <p>Full comment in attachment</p>	<p>We acknowledge your comments and appreciate the input. This is one of the policy recommendations in the CIPP. For more information, please refer to Chapter 8.3 of the CIPP.</p>

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11	<p>KESESUAIAN KEGIATAN PEMANFAATAN RUANG (KKPR) The Validator of the Kesesuaian Kegiatan Pemanfaatan Ruang (KKPR) should:</p> <ol style="list-style-type: none"> 1. Possess comprehensive knowledge of the renewable energy sector, inclusive of wind farms, and the necessary facilities to build a power plant, not limited to just wind farms or renewable energy generators. 2. Has understanding to encompass the business sector (including standardized business classifications or "KBLI") available to project developers, ensuring no refusal or cancellation of KKPR requests due to misinterpretations of the applicant's business classifications. 3. Comprehend the facilities/infrastructure required by a wind farm (or other power generation systems) to avoid rejections or cancellations of KKPR applications based on assumptions that a proposed power plant facility in the KKPR master plan does not align with the power plant's actual necessities. 4. Understand the land requirements for a power plant, ensuring the non rejection or cancellation of KKPR applications due to the perceived complexity of the requested polygon or variations in land use, as different types of power plants have diverse land needs. To address any uncertainties or interpretations, face-to-face meetings with the relevant KKPR applicants for clarification should be conducted, preventing unwarranted rejection and subsequent repetition of the KKPR application process. 	We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency.
11	<p>THE NEED OF CERTAIN RULES/MECHANISM TO RESOLVE LAND OVERLAPPING ISSUES The need for certain rules and mechanisms to resolve land overlapping issues is particularly critical: project viability, encouraging investments and development, legal clarity, timely project implementation, long-term planning</p>	We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency and to PLN (to the extent applicable).
11	<p>Risk and Mitigation Measures (Table 8.1-4) 1. To mitigate the failure to issue RUPTL that would provide project pipeline: Regarding the risk and mitigation measures, on the regulatory dimension, it's mentioned that for the failure to issue RUKN and RUPTL that would provide a project pipeline for investment; the proposed mitigation is by using the Just Energy Transition Partnership (JETP) investment plan under the comprehensive investment and policy plan. While the idea of using the JETP investment plan to mitigate regulatory risks is welcomed, it is imperative to acknowledge the importance of project integrity within these lists. Any project or timeline included in these lists must be subject to rigorous integrity checks to prevent the undesirable "rubbish in, rubbish out" scenario. This ensures that the project pipeline maintains a high standard of quality and viability, safeguarding the interests of investors and the overall health of the energy sector.</p>	We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency and to PLN (to the extent applicable).

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11	<p>Risk and Mitigation Measures (Table 8.1-4)</p> <p>2. To mitigate the risk of lack of coordination amongst government departments on energy transition: Addressing the lack of coordination among government departments during the energy transition requires strong leadership, effective progress tracking, and interventionist empowerment. The current system, which primarily focuses on monitoring, often fails to deliver the necessary guidance and empowerment to intervene, reset the course, and problem-solve when challenges arise. Without these elements, achieving ambitious targets like 23% by 2025 becomes a formidable challenge, making it imperative to reevaluate and enhance the coordination and leadership aspects of the energy transition process.</p>	<p>We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency and to PLN (to the extent applicable).</p>
11	<p>Proposed Reform Roadmap - Medium Term (page 171)</p> <p>Instead of attempting to compel manufacturers to establish operations in Indonesia when the necessary resource base might be lacking, it would be more prudent to concentrate on reaping the supply chain benefits and exploring synergistic opportunities in construction and Operation & Maintenance (O&M) activities. By doing so, the local industry can still thrive, generate employment, and foster economic growth without imposing undue burdens on manufacturers. Moreover, it's essential to avoid situations where Independent Power Producers (IPPs) are beholden to Original Equipment Manufacturers (OEMs) with a certain registered local company (Perseroan Terbatas). This approach can hinder competition and innovation, potentially leading to less favorable outcomes for the energy sector. Encouraging a fair and competitive landscape for IPPs will promote efficiency,</p>	<p>We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency and to PLN (to the extent applicable).</p>
11	<p>Rational for Reform (Page 184)</p> <p>Based on our industry knowledge and the available Met Masts data, it becomes evident that a significant portion of the planned 597MW of wind power capacity, approximately 200MW, lacks a bankable resource assessment or potentially lacks a bankable resource altogether. This critical observation highlights a fundamental challenge in the industry—without a reliable assessment of the wind resource, it becomes challenging to progress these projects into the procurement stage. The lack of bankability of the resource assessment is a significant hindrance to moving forward. Furthermore, an additional 50MW of capacity is considered dubious in terms of its ability to secure permits in the identified resource location. This observation further accentuates the complexity and hurdles faced by wind power projects in Indonesia. Approximately 40% of the current wind farm plan is fundamentally hindered by these challenges, which is a significant setback considering the assets have bankable Feasibility Studies issued.</p>	<p>We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency and to PLN (to the extent applicable).</p>

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11	<p>Project Preparation (Page 185) We wholeheartedly support the imperative for comprehensive Feasibility Studies, a commitment we've also demonstrated by providing such studies to PLN. This commitment to robust FSS is essential for the successful engagement of both Independent Power Producers (IPPs) and PLN in the procurement process.</p>	<p>We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency and to PLN (to the extent applicable).</p>
11	<p>Project Preparation (Page 185) The statement is misleading and inappropriately generalizes the process of procuring land and permits for renewable power projects. While it may apply to some instances, it's essential to clarify that the responsibility for securing land and permits often rests with Independent Power Producers (IPPs) to meet the standards and terms set by financiers. And in the context of Indonesia, it is often impractical due to the complexities of land titles and inconsistencies in permitting procedures.</p>	<p>We acknowledge your comments and appreciate the input. In particular, we acknowledge the complexity of land procurement. We have added recommendations to streamline the land procurement processes into a single window system. For more information regarding policy recommendations in relation to procurement processes at PLN, please refer to Chapter 8.3 of the CIPP.</p>
11	<p>Project Preparation (Page 185) In our experience, tax incentives provided by the government are to be approached with great caution, and in some cases, it may be advisable not to adopt them. A case in point is our own experience where our Sidrap wind farm was awarded a tax allowance incentive in 2016/2017, only to have it revoked in April 2022, resulting in significant financial damage due to a miscommunication in an auditing process. This matter is currently the subject of ongoing court proceedings. Foreign Direct Investment IPP are strongly advised to exercise prudence and refrain from pursuing any allocation of such incentives until the ongoing deliberations regarding the revocation of Renewable Energy-related IPP incentives are resolved or clarified.</p>	<p>We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency.</p>
11	<p>Project Preparation (Page 185) This statement lacks a strong foundation, as it assumes that the government and utility are inherently better equipped than the bidder to handle issues such as land identification, coordination with local government and communities, and landowner compensation. In Indonesia, given the absence of compulsory purchase order legislation and the non-communicative nature of the state, the government and utility do not necessarily have a distinct advantage in negotiating land and permits compared to an IPP that possesses the requisite skills and resources for these tasks. In Indonesia, it is crucial to acknowledge that the negotiation of land and permits requires specialized skills and resources, and IPPs with the requisite expertise can be equally adept in handling these matters.</p>	<p>We acknowledge your comments and appreciate the input. The government has shown a track record in supporting the land acquisition for other infrastructure projects.</p>

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11	<p>Land Acquisition (Page 185)</p> <p>The predominant issue lies within the inadequacies of the land title system in Indonesia and its associated certification processes, which remain incomplete. This inadequacy presents challenges in mapping and issuing clear, non-disputed land titles, creating a complex landscape of ownership and land use matrices. Until these fundamental issues are resolved, the Government, Utilities, and Independent Power Producers (IPPs) face identical challenges in negotiating, securing, and certifying land in areas where ownership and land use remain unclear and disputed. In several locations, it is practically unfeasible to resolve these issues, potentially leading to the immobilization of resources, particularly in the realm of Renewable Energy projects, while awaiting the completion of the mapping process—a responsibility that falls under the purview of the Government.</p>	<p>We acknowledge your comments and appreciate the input. We acknowledge the complexity of land procurement. Applicable laws/regulations in relation to land acquisition include [1] the 2012 Land Acquisition Law (Law No. 2/2012) (as amended by the Omnibus Law) and [2] its implementing regulation GR No. 19/2021.</p> <p>We have added recommendations to streamline the land procurement processes into a single window system.</p>
11	<p>Proposed Reform Roadmap (Page 187)</p> <p>The statement suggests a strategic approach to streamline the RUPTL planning process by considering a more comprehensive perspective on renewable resources, including mapping these resources and defining Renewable Energy Zones (REZs) with high quality RE resources. However, it is essential to highlight that this approach can only be effective if it incorporates constraints analysis, accounting for:</p> <ol style="list-style-type: none"> 1. Geohazard and topography factors, along with the associated foundation costs and logistics. 2. Environmental allocations and sensitivities to ensure environmentally responsible development. 3. Land type and ownership, including land certification and the complexities of land use. <p>Without these constraints in mind, the concept of a Renewable Energy Zone (REZ) may inadvertently point to areas where development is unfeasible or restricted. Drawing from UPC's experience, it is evident that a significant percentage of resources in Indonesia, particularly those related to solar power plants and wind power plants, face constraints related to one or more of these factors. Including these constraints, and considerations is pivotal for the practical implementation of an effective and sustainable RUPTL planning process in the context of Indonesia.</p>	<p>We acknowledge your comments and appreciate the input. These are issues we are also considering in more detail for streamlining the planning process as part of the implementation phase of the CIPP.</p>
11	<p>Project design and preparation of specifications (Page 187)</p> <p>The proposed concepts of PLN expanding its role in project pre-development and technical studies, including options for land procurement, necessitate in-depth Focus Group Discussion (FGD) sessions with financiers.</p> <ol style="list-style-type: none"> 1. The 'lease' route may not be considered bankable as we currently understand it. Further discussions with financiers are essential to determine the feasibility and 	<p>We acknowledge your comments and appreciate the input. These are issues we will consider in more detail as part of the implementation phase of the CIPP.</p>

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	<p>acceptability of this approach within the Indonesian context.</p> <p>2. The option to purchase, as practiced in India, might not be directly applicable in Indonesia due to the unique complexities of land titles and encumbrances in the country. This particular approach may not be deployable within the Indonesian legal and regulatory framework, and its compatibility with financiers' expectations needs</p>	
11	<p>Project design and preparation of specifications (Page 187): The statement suggesting that PLN should take on an expanded role in ensuring the quality of Renewable Energy (RE) resource sites, grid connections, and data availability may not be practical, as PLN is primarily a system operator and not a Renewable Energy Developer. PLN may lack the specialized skills and the extensive workforce required to execute such a model.</p> <p>Solar power plant projects, in particular, demand substantial land resources, while wind farms also require significant land use, albeit in a linear manner rather than in blocks. These factors pose significant logistical and operational challenges that may fall outside the scope of PLN's core expertise and capabilities.</p> <p>In essence, PLN's primary role as a system operator may not align with the comprehensive responsibilities suggested in the statement, and the practicality of PLN taking on these additional roles may require further evaluation.</p>	<p>We acknowledge your comments and appreciate the input. This role could be assigned to a PLN subsidiary as already happened in the case of the dedieselisation procurement where the PLN subsidiary is responsible for land acquisition and permitting</p>
11	<p>Preparation of RFP for procurement (Page 188)</p> <p>The emphasis should be on streamlining and expediting procurement processes rather than significantly expanding PLN's organizational structure. Implementing streamlined procedures, such as utilizing Feed in Tariffs, standardized PPAs, and fixed project deadlines, would provide a more efficient approach to driving progress and achieve RE targets. This simplified strategy could help generate momentum and make substantial progress toward the set goals, ultimately reducing the need for extensive structural changes within PLN.</p>	<p>We acknowledge your comments and appreciate the input. Renewable energy procurement improvements are part of the policy recommendations in the CIPP. For more information, please refer to Chapter 8.3 of the CIPP.</p>
11	<p>Preparation of RFP for procurement (Page 188)The contention that bidders should be provided with a minimum of 3-6 months for proposal submission may not address the key challenges faced in projects like Tanah Laut and Timor Wind Farm. The limited participation of only 2 bidders in these cases is likely not due to the duration for proposal preparation but rather associated with the unattractiveness of the Power Purchase Agreement (PPA), elevated bidding risks within a procedural void, and substantial bid bond requirements. It is pertinent to note that bidders must have adequate time for resource assessments to establish bankability, as bidding based on a model of resources carries inherent risks in Indonesia, particularly in the wind energy sector.</p>	<p>We acknowledge your comments and appreciate the input. As discussed above, renewable energy procurement improvements are part of the policy recommendations in the CIPP. For more information, please refer to Chapter 8.3 of the CIPP. Finally, we will pass this comment to the relevant Government agency and PLN (to the extent applicable).</p>
14	<p>Strengthening domestic supply chain of renewable energy by reforming Local Content Requirement (LCR)</p>	<p>We acknowledge your comments and appreciate the input. In the meantime, government has issued MOI regulation that</p>

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	Full comment in attachment	gives relaxation for solar PV module procurement until 2024. Starting January 2025, solar PV projects has to have 60% LCR. For more information, please refer to Chapter 8.1 of the CIPP.
14	Adjusting supply-side incentives. Removing coal price cap and government subsidies with addition that coal producers must give compensation to PLN to alleviate the increase in PLN's costs if market prices rise above the original cap of 70 US\$/ton. Full comment in attachment	We acknowledge your comments and appreciate the input. Supply-side incentives and market structure are assessed in detail in the CIPP. For more information, please refer to Chapter 8.2 of the CIPP.
14	Improving renewable energy procurement processes CIPP recommendation: PLN and/or The Government is responsible for land procurement in renewables project. Full comment in attachment.	We acknowledge your comments and appreciate the input. We acknowledge the complexity of land procurement. Applicable laws/regulations in relation to land acquisition include [1] the 2012 Land Acquisition Law (Law No. 2/2012) (as amended by the Omnibus Law) and [2] its implementing regulation GR No. 19/2021. We have added recommendations to streamline the land procurement processes into a single window system.
14	Improving renewable energy procurement processes Questions about the Assignment of PLN Subsidiaries. The CIPP argues that the involvement of PLN Subsidiaries in the project company is a hinderance because State owned assets can't be given as securities. Full comment in attachment.	We acknowledge your comments and appreciate the input. This issue is already part of the policy recommendations related to PLN procurement. For more information, please refer to Chapter 8.3 of the CIPP.
14	Improving renewable energy procurement processes Transmission and distribution systems upgrades, form regulations to encourage development of scale efficient transmission projects, and substantial changes to the existing grid. Full comment in attachment.	We acknowledge your comments and appreciate the input, however for us it is not so clear the reference for your comments.
14	Improving renewable energy procurement processes Evaluation of relevant experience as one of the prequalification considerations in	We acknowledge your comments and appreciate the input. This will be discussed in

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	<p>DPT registration. The CIPP document proposes the inclusion of previous experience as a criterion for eliminating companies in the prequalification stage.</p> <p>Full comment in attachment.</p>	<p>the procurement policy recommendation during the CIPP implementation.</p>
14	<p>Making power purchase agreements more bankable Generally, the idea of creating a standard form template for a Power Purchase Agreement (PPA) to streamline procurement processes and reduce transaction costs is a good one. The exact PPA standard form has not been created yet, so this feedback can't pinpoint specific problems with those PPA standard forms.</p> <p>Full comment in attachment.</p>	<p>We acknowledge your comments and appreciate the input. Your note regarding the difference between force majeure and hardship are also noted and have been considered by the team. We also appreciate the note regarding the need for flexibility. We will consider these during the implementation phase of the JETP Secretariat agenda.</p>
14	<p>Enabling early coal retirement and managed coal phaseout Firstly, proposed changes do not incorporate just transition considerations regarding the social impact of early coal retirement and phase-out especially to vulnerable groups such as marginalized communities, women and children; Secondly, a crucial aspect of the process involves establishing clear and comprehensive criteria for the early retirement of CFPP; Thirdly, for the early retirement or managed phase out of IPP-owned CFPPs, it's essential to examine the legal foundations, operational mechanisms, and the process of contract negotiations; Additionally, there is a need for direct input or reports to PLN, conveying that in the long term, renewable energy sources such as solar panels are operationally cheaper.</p> <p>Full comment in attachment</p>	<p>We acknowledge your comments and appreciate the input. Technical and just transition considerations are applied in the project selection process as described in Chapter 5. The policy section serves as chapter to discuss policy recommendations to create the legal and regulatory enabling environment to allow the early retirement of coal plants, once they have been selected. We have noted your recommendations regarding incorporating technical considerations into the early retirement strategy and we will pass them to the Government of Indonesia.</p>
14	<p>Ensuring PLN financial sustainability; The suggestions that seem to impose heavy financial burdens on PLN are not yet entirely realistic in terms of the Indonesian government's budget, unless there is a substantial injection of funds. The business model of PLN, as indicated in reports, is rife with subsidies and is not inherently sound as a "business entity." It is crucial to consider in sustainability plans to continually provide subsidies to avoid creating dependence on coal subsidies and EBT profit subsidies. This is essential for PLN to eventually stand on its own. If PLN is involved in policy discussions and can determine quotas to maintain its electricity grid, it is advisable for PLN to treat its sub-holdings at arm's length in terms of policy. Contracts should not be awarded solely because they are sub-holdings of PLN. Fair opportunities should be given to those who wish to engage in Power Purchase Agreements (PJB) with PLN, rather than limiting options to sub-holdings or affiliates.</p>	<p>We acknowledge your comments and appreciate the input. We have the same view of complexity when it comes to PLN financial sustainability. We will pass this comment to the relevant Government agency and to PLN (to the extent applicable).</p>

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14	<p>Strengthening financial policy to support Indonesia's energy transition In summary, while there are ongoing efforts to enhance FIs' involvement in sustainable finance, the specific regulatory frameworks and instruments, especially concerning disclosure standards, credit guarantees, and incentives, are yet to be fully developed.</p> <p>Full comment in attachment.</p>	<p>We acknowledge your comments and appreciate the input. The JETP Secretariat is already providing input to OJK on its revision for the Indonesian Green Taxonomy as a way forward to adopt transition activities to the taxonomy. We believe this would encourage more participation in the five IFAs.</p>
15	<p>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 Renewable Energy 	<p>We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency and to PLN (to the extent applicable).</p>
16	<p>p198. "The 2021-2030 Long-Term Electricity Procurement Plan (RUPTL) indicates that Indonesia's energy system is still dependent on fossil fuels. To meet the JETP target to increase NRE out of its overall energy mix to 34% by 2030, the RUPTL needs to be updated to accommodate more NRE projects.</p>	<p>We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency and to PLN (to the extent applicable).</p>
16	<p>p200. "Business models and transactions are being discussed by various stakeholders to enable the early retirement of IPPs. These include the Energy Transition Mechanism proposed by the Asian Development Bank for the Cirebon-1 plant in West Java, which uses concessional financing to reduce the timeline for debt and equity returns, thereby bringing up the timeline to early retirement (refer to 0 for financing structure of these early retirements)." Affected workers and local communities around PLTU Cirebon 1 and PLTU Pelabuhan Ratu (which have been selected as a pilot projects for early retirement under ETM platform) should be meaningfully participated from early stage in order to mitigate any social risks associated with the Plants early retirement. This effort is to ensure "no one left behind" principle.</p>	<p>We acknowledge your comments and appreciate the input. We have raised the need for meaningful stakeholder engagement and participation in all Investment Focus Area including early coal retirement in Chapter 6 on Just Transition, and particularly in subchapter 6.2.3.2 JT Interventions at the subnational and national level. Please bear in mind that the CIPP is not a policy document.</p>
16	<p>p.214 Regarding to the Policy Reform Roadmap, in the implementation options of reform approach, we propose the immediate action that PLN strengthen power system governance, we would like propose the point of "an establishment of collaborative teamwork with influential financial entities such as The Indonesia Financial Services Authority (OJK) as well as Corruption Eradication Commission (KPK) meticulously supervise the strategic initiatives orchestrated by PLN in managing financial operations. The overarching goal is to systematically institute a financial environment characterized by fairness and equity."</p>	<p>We acknowledge your comments and appreciate the input. Governance is a key element of the Energy Transition Task Force that has been established by the CMMAI Decree No. 144/2023. The Task Force comprises several committees including an oversight committee that consists of KPK, BPKP and DEN.</p>

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16	<p>p.220. “Credit guarantees incentivize FIs by de-risking investment in energy transition projects and potentially accelerating the deployment of enabling technologies.”</p> <p>De-risking facilities under the JETP CIPP should attract investors while ensuring they align with strict climate, environmental, and sustainability criteria, government targets (e.g., Paris Agreement and SDGs), and have a clear risk analysis. These incentives should avoid jeopardizing public budgets or prioritizing short-term profits and high shareholder payouts in the private financial sector.</p>	We acknowledge your comments and appreciate the input.
18	<p>OECD CEFIM industry framework implementation will prioritise better enabling investment conditions, including sectoral decarbonisation roadmaps, enhanced regulations, research and development strategies, 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>	We acknowledge your comments and appreciate the input.
20	<p>p200. Enabling policies – ETM</p> <p>Para pekerja yang terdampak dan masyarakat setempat di sekitar PLTU Cirebon 1 dan PLTU Pelabuhan Ratu (yang telah dipilih sebagai proyek percontohan untuk pensiun dini di bawah platform ETM) seharusnya ikut serta secara berarti sejak awal untuk mengurangi risiko sosial yang terkait dengan pensiun dini dari Pembangkit Listrik tersebut. Upaya ini bertujuan untuk memastikan prinsip "No. one is left behind".</p>	We acknowledge your comments and appreciate the input. We have raised the need for meaningful stakeholder engagement and participation in all Investment Focus Area including early coal retirement in Chapter 6 on Just Transition, and particularly in subchapter 6.2.3.2 JT Interventions at the subnational and national level. Please bear in mind that the CIPP is not a policy document.
20	<p>p.220. Fasilitas pengurangan risiko (de-risking facilities): Fasilitas pengurangan risiko yang dibuat di bawah JETP CIPP tidak hanya untuk menarik investor, tetapi juga selaras dengan kriteria iklim, lingkungan, dan keberlanjutan yang ketat, target pemerintah (misalnya, Perjanjian Paris dan Tujuan Pembangunan Berkelanjutan), dan memiliki analisis risiko yang jelas. Insentif tidak boleh mengancam anggaran publik atau memberikan prioritas pada keuntungan jangka pendek dan pembayaran dividen tinggi untuk sektor keuangan swasta</p>	Kami berterima kasih atas komentar Anda dan menghargai masukan tersebut. Hal tersebut sesuai dengan prioritas alokasi pendanaan JETP.
23	<p>The eighth chapter of the JETP CIPP proposes the removal of the Domestic Price Obligation (DPO), 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. AEER advises caution in this policy adjustment, acknowledging the potential boomerang effect—positive price incentives for reinvestment and expansion of coal mining become a threat to achieving climate and biodiversity action target.</p>	We acknowledge your comments and appreciate the input. PPAs are confidential, so they will not be disclosed. Procurement for renewable energy has been done and will continue to be done through competitive bidding.

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	<p>The delicate balance required in policy adjustments is underscored by the need to avoid inadvertently incentivizing developments contrary to the overarching goals of a just and sustainable energy transition. AEER emphasizes the necessity for transparency in project implementation involving various stakeholders in the planning and execution stages to ensure informed decision-making and garner community feedback without coercion. For example, this could be done through disclosure of Power Purchase Agreements (PPAs) and appointment in independent appraiser to avoid over-compensation.</p> <p>In conclusion, AEER's feedback underscores the need for a comprehensive, inclusive, and cautious approach to the implementation of JETP, addressing financial, social, and policy aspects to ensure a just and sustainable energy transition in Indonesia</p>	
24	<p>Order of priorities in enabling policies recommendation. Please advise whether JETP Secretariat plan to outline the top priority policy reform required within the CIPP. Considering the complexity of the interests involved, outlining the top priority reforms could be beneficial.</p>	<p>We acknowledge your comments and appreciate the input. The CIPP is not a policy document. The CIPP is a strategy document that can be used as a recommendation to the Government of Indonesia for power sector planning and policymaking as part of the JETP process. However, the CIPP aims to assess best practices which are fit for purpose from more mature markets and will continue to evaluate recommendations on an ongoing basis as the CIPP is designed as a living document.</p>
24	<p>Predevelopment of candidate energy investment sites (section 8.3.5 and Table 8.3-3)</p> <p>The table language indicates that there may be impatience to wait for project development work to be completed before sending a project to tender. Government should not ignore the benefits of wellplanned, well-prepared projects in achieving timely, good quality outcomes.</p> <p>For efficient, cost effective, and timely project implementation, there is no substitute for preparation.</p> <p>Environmental studies, land and geotechnical surveys, land acquisition, specifications, interconnections, standardized procurement documents all serve to materially de-risk a project, making the challenges better known, solutions more certain, and likely overall less expensive. The time and money put into addressing these preparations is returned in shorter implementation times at lower cost. This has been proven out time and again in countless public-private infrastructure</p>	<p>We acknowledge your comments and appreciate the input. Section 8.3.5 and Table 8.3-3 contained within it sets out the risks (and mitigation efforts) relating to existing renewable energy procurement processes and the recommendations that have been raised within the CIPP. This Sub-chapter acknowledges the need to move at meaningfully fast and and at the scale required to meet NDC and carbon neutrality targets whilst maintaining an appropriate level of project preparation and quality. Please refer to other parts within Chapter 8.3 in which the CIPP highlights the need for government</p>

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	<p>projects globally. Relying on the private sector to undertake certain activities like land acquisition can lead to long delays and eroded project economics, and even project failures.</p>	<p>supports in pre-development activities and land acquisition for efficient, cost effective, and timely project implementation.</p>
<p>24</p>	<p>PLN mandatory equity participation in projects. (8.3.5) Indonesia needs the cost of JETP and the energy transition to be as low as possible with the quality of outcomes being as high as possible. Money is an issue. Achieving lower-cost commercial financial participation would be aided by having clear delineation of roles between the public and private sectors on either side of a transaction. Forced/mandatory public equity participations in projects are unlikely to achieve lower cost, higher quality outcomes.</p> <p>Scaring away prospective investors, narrowing the field. Mandatory equity participation in projects is a practice that can greatly reduce the field of interested private sector participants, potentially those delivering the highest value, with the most advanced technology, and/or with the greatest expertise. In order for a private entity to have a strong, certain and low-cost bid, it cannot have variables introduced that hold the potential of disrupting or impeding achievement of those goals, whether during construction, testing or operation. Having an outside partner who was not part of the development planning, financing and contracting processes leading up to a bid, creates large unknowns as well as a large conflict of interest. It is imperative in the energy transition - given the potentially wide application of technologies required for RE, EE, electrification, fuel switching, etc - that Indonesia have access to the best technology providers, the best implementers and managers of that technology, and provide them the incentive to do their best. Forcing them to give away equity share not only undermines their financial returns, but it also could put them in a position of compromising their intellectual property (particularly for cutting edge tech). Many companies would rather walk away from an opportunity before it starts than face such potential losses.</p> <p>Challenges of valuing government equity in a project company. In the role of equity partner, PLN either has to come to the table with cash equity or an objectively verifiable in-kind contribution. The risk or temptation is always to ask for an out-sized equity share - what is effectively a carried interest (i.e. payment in exchange for no contribution of money or services). This means that private sector bidders have to bid higher in order to make their target return and to make up for earnings lost due to the PLN carried interest. All this serves to do is to make the tariff to consumers higher (or, effectively, the subsidy to rebalance PLN's finances higher as a result of the higher tariff). Charge the winning bidder a price for preparation activities. Land acquisition,</p>	<p>We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency and to PLN (to the extent applicable).</p>

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	<p>predevelopment studies, licenses and permits are extremely valuable; that value should be recognized. However, a more transparent and certain way to achieve that is by placing those assets into tender documents and assigning a value to them – something for which the winning bidder would be required to compensate the government. Then the investment is recovered, the risks mitigated and the bidders can focus on delivering the greatest value for money.</p> <p>Separate regulation from investment. Being on both sides of a project also holds the potential to undermine the effectiveness of good, objective oversight and regulation of the PPA by PLN. Enforcing penalties or restrictive provisions on a project where PLN is also an equity shareholder serves to undercut equity return earned by PLN. This increases the risk that things like poor operating performance, bad availability, poor environment, health and safety provisions could go overlooked/unaddressed. This further undermines the economics of a project and the delivery of high value services to customers (i.e. the people).</p>	
24	<p>Closing a CFPP at the end of a PPA contract (8.4.3.2) Whether an IPP is under BOT or BOOT, once the PPA governing that plant has expired, PLN has no obligation to keep those plants running nor any obligation to buy power after the contract period. Further, due to the nature of IPP project financing, at end of a PPA all monies - both debt and equity - have been recovered. Effectively, the plant could be treated as having zero value at the end of the contract. Thus, there is no financial reason to perpetuate the plant life. Non-investment matters such as the plant being materially more fuel efficient or environmentally cleaner than any other plant on the system could be an exception, but they would need to be materially so. For projects that are nearing the end of their PPAs, end of contract plant retirements offers a low cost means by which to decarbonize the grid. Of course, due to the young age of many IPP projects, there are not currently many such opportunities. However, there will be many during the period through to 2050.</p> <p>Allowing for end-of-contract closure, even for a BOOT project, is supported by the shift in accounting from January 2016 that looks at PPAs as purchase and sale of electrons, not a capitalized lease of an asset (as noted in section 8.4.3.3).</p>	<p>We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency, PT SMI and to PLN (to the extent applicable).</p>
24	<p>CFPP Early Retirement (Section 8.5) As noted in Appendix 10.2, there are currently only two CFPPs identified for early closure under JETP. However, even anecdotally, it is likely that there are many more plants that could be considered for closure, either due to their age, reliability, efficiency, emissions profile and/or financial position.</p> <p>There are a number of actions that could be taken to help shed light on and expand</p>	<p>We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency, PT SMI and to PLN (to the extent applicable).</p>

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	<p>the list of potential retirement candidates.</p> <p>Inventory of all operating facilities and their characteristics. A comprehensive inventory of plant age, efficiency at various load factors and historic dispatch rates could be published that shows the merit ranking of each facility on the grid. This would make clear which plants may be underperforming technically, may be already making minimum cash payments in lieu of electricity under a take-or-pay arrangement, and thus be identified as surplus power. Making this available to all JETP participants gives a clearer view of early retirement opportunities and values.</p> <p>Identify which IPPs not meeting minimum dispatch by PLN. Any IPPs that are regularly being paid in lieu of delivering electricity could become candidates for early retirement.</p> <p>Despite the contractual complexities, as the CIPP acknowledges, addressing this situation earlier than later could wind up saving PLN and the MOF money in the longer run. There may be room for potential negotiation.</p> <p>Shrink portfolio of operating plants for optimal load management. Consolidating dispatchable operations amongst fewer plants could see those that remain operate at higher, and therefore more efficient, capacity factors. This is likely preferable than having all or a majority of plants operating at low and therefore fuel inefficient capacity factors, which are ultimately more polluting per kWh. Such consolidation would also limit the number of plants that might need to be retrofitted, as the CIPP identifies, as needed for low CF ops. Selection of plants for consolidation would be subject to identifying grid constraints.</p>	
24	<p>PLN asset valuation (8.5.1, last paragraph)</p> <p>Addressing regulations and practices on accounting for state-owned plant/assets would greatly assist in the ability to shut down older, degraded, and/or higher emitting PLN assets. Having the ability to impair and/or fully write-off old plant would allow for greater pace of decarbonization, while simultaneously helping reduce the grid intensity of CO2 across the remainder of the operating fleet. Accounting practices were amended and adjusted to create the current book practices; that also means that they could potentially be amended and adjusted again.</p>	<p>We acknowledge your comments and appreciate the input. We will pass this comment to the relevant Government agency, PT SMI and to PLN (to the extent applicable).</p>
24	<p>Gas price cap. p.208 suggest that coal price cap incentivizes the use of coal over gas or renewables, but there is no reference toward the current practice of gas price cap based on ESDM ministry decree which also undermine renewables competition.</p>	<p>We acknowledge your comments and appreciate the input. The gas price used in the JETP Power Sector Pathway modelling refers to the gas price reference used in the RUKN.</p>

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24	<p>Tariff adjustment and political will. p.213 'gradually restoring the automatic tariff adjustment mechanism' implies that the regulation has been established but the absence of political will render it ineffective. Please advise from JETP secretariat what dynamics would likely change post JETP suggestions.</p>	<p>We acknowledge your comments and appreciate the input. We have already acknowledged the political risks that accompanies policy reforms suggested in the CIPP. The Secretariat has included mitigation measures, including putting public communications and stakeholder engagement. We would also like to reiterate that the CIPP is not a policy document. The CIPP is a strategy document that can be used as a recommendation to the Government of Indonesia for power sector planning and policymaking as part of the JETP process.</p>
25	<p>(p.174) Regarding price control (DPO). JETP recommends that submitting coal prices to market mechanisms may indeed reveal the real energy cost. This can be contradict with Article 33 of the 1945 Constitution of the Republic of Indonesia, specifically verse 3: "The earth and water and natural resources contained therein shall be controlled by the State and be utilized for the greatest prosperity of the people" as previously stated on chapter 6. We suggest either to take out the narration about article 33 of 1945 in chapter 6 or to revise the policy recommendation to avoid contradiction.</p>	<p>We acknowledge your comments and appreciate the input. The policy reform suggested in the CIPP relating to DPO does not relinquish the control of the state over the utilization of coal as a natural resource for the greatest prosperity of the people. Rather, the relevant DPO mechanism suggested is actually aimed to ensure that final electricity price remains affordable to the people, whilst enabling PLN to use coal market price as a basis for future business modelling and system planning. Making sure that the electricity price remains affordable is a clear way of the State delivering maximum benefit for the people.</p>
25	<p>(general input for chapter 8) To strengthen the argument for implementing a just energy transition, We suggest adding an analysis (graph) showing the projected prices of traditional energy (fossil fuel) compared to the prices of new renewable energy. This data can be in the form of a graph showing the year and price projections. In what year will Indonesia be able to provide renewable energy at affordable prices compared to fossil fuel energy sources. This price projection graph is very important as a rational basis for a just energy transition. This data will also provide a clearer picture of the targets for achieving renewable energy which is not only good for the environment, but also easily accessible to the entire community, especially economically vulnerable communities. This is in accordance with the energy equity principle.</p>	<p>We acknowledge your comments and appreciate the input. The topic of interest has been touched on in Chapter 5, which generally discusses assumptions underpinning the JETP power sector pathway. Studies have been undertaken comparing differences between renewable energy prices as compared to fossil fuel prices. In relation to the CIPP, table 5.2-1 sets out certain key macro and fuel price assumptions.</p>

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26	<p>"-The proposed change of DMO should be accompanied by an obligation on economic dispatch based on the real cost of coal for PLN -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>	<p>We acknowledge your comments and appreciate the input. Based on the JETP power sector pathway modelling, it is shown that systems cost will increase for the next few years but will be followed by a decline. Therefore, it is expected that, over time, the costs underpinning the system will increasingly reflect market condition and therefore distribute the benefit and burden more equitably.</p>
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Chapter 9

Public Submission Number	Comment	JETP respond to comment
1	<p>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>Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Indikator dan target primer masih akan disusun di fase implementasi JETP. Aktivitas pemantauan dapat dilakukan melalui website JETP.</p>
8	<p>Local Government Participation Learning from South Africa, one of the transformations made to accelerate the development of renewable energy is to authorize sub-national governments, especially districts/cities to develop or purchase power plants by referring to the Integrated Resource Plan (or in the Indonesian context, the National Electricity General Plan). Given that in the Indonesian context, energy and electricity planning is also mandated up to the local level, it is crucial to be able to strengthen the process and governance of this planning, so that planning can be done by genuinely considering the needs and uniqueness of the region, not just referring to the national planning.</p>	<p>We acknowledge your comments and appreciate the input.</p>
14	<p>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>We acknowledge your comments and appreciate the input. Governance is a key element of the Energy Transition Task Force that has been established by the CMMAI Decree No. 144/2023. The Task Force comprises several committees including technical and policy, financing, socio-economic transition and environment, and oversight committees.</p>
18	<p>The OECD CEFIM Programme is discussing a MEMR secondment program to OECD CEFIM to foster human capital development and knowledge sharing on clean energy finance and investment for MEMR officials, including clean energy</p>	<p>We acknowledge your comments and appreciate the input.</p>

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	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. [READ THE DETAILS in attachment]	
25	(p.227) The JETP working group does not represent a balance in the energy trilemma. We suggest adding another WG specifically working on Energy Equity.	We acknowledge your comments and appreciate the input. The importance of balancing the Energy Trilemma is embedded in all working groups. For example, the policy recommendation on supply-side incentives (DMO, DPO) are recommended with the Trilemma in mind. Another example is the Technical power sector pathway, where the system costs are constantly monitored to ensure energy affordability whilst still ensuring accessibility and sustainability.
26	"-Governance needs an 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 -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"	We acknowledge your comments and appreciate the input. At the time being, we believe the JETP Secretariat should be sufficient to conduct meta-monitoring towards various tasks such as program management, project planning. On knowledge sharing and communications, we believe the JETP Secretariat should be sufficient to do so via various levers, such as the JETP website. We will continue to monitor the progress on this end to ensure that the JETP governance allows for the most optimal method moving forward.

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Chapter 10

Public Submission Number	Comment	JETP respond to comment
1	<p>Untuk Kepmenkomarves No 144 Tahun 2023 apakah sudah tersedia di kanal kementerian/JETP? Karena kami coba cari dan ingin unduh via google tidak ditemukan.</p> <p>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>	<p>Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Kita akan cek dari Tim Kemenkomarves untuk memastikan bahwa Kepmenkomarves no 144 telah dimasukkan ke website dan juga untuk Permenkeu tentang country platform</p>
14	<p>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. [THIS IS JUST SUMMARY - 62 pages attachment overall]</p>	<p>We acknowledge your comments and appreciate the input.</p>
18	<p>Energy Saving Insurance (ESI) model, could be one of the models considered for energy efficiency and electrification focus area. [READ THE DETAILS in attachment]</p>	<p>We acknowledge your comments and appreciate the input. Great insight. We will consider this for our new EE working group.</p>
24	<p>Appendix 10.2 – Retirements The limited scope of currently identified retirement projects would be worth revisiting with a view to expanding to possible future candidates. It is understood that these are the two candidate assets willing to discuss/contemplate retirement. However, shouldn't there be a listing available of assets that are potential candidates - i.e. old enough (middle to late age - meaning significant debt has been paid down and equity return is ramping up), moderately performing (perhaps below take-or-pay dispatch factors and/or moderately lower technical efficiency performance) that might make them higher priority for accelerated retirement?</p>	<p>We acknowledge your comments and appreciate the input. The government is actively developing an early retirement roadmap under Presidential Regulation 112/2022. This initiative targets the retirement of up to 5.2 GW of capacity. While the current focus is on assets that have expressed willingness for early retirement discussions, the roadmap also includes criteria for identifying potential candidates. These criteria consider factors such as age, debt status, and performance efficiency, which are crucial in prioritizing assets for accelerated retirement. Your suggestion to expand the list of potential candidates is</p>

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		noted and aligns with our ongoing efforts to refine the retirement strategy
24	<p>Appendices 10.3 to 10.7 – New capacity investments Assuming that money was available for all of these projects, there would likely be a need to prioritize which projects were implemented first. Prioritization is probably needed given the sheer scale of human and institutional resources required to implement, but also due to potential physical network priorities. The vast majority state currently “starting date” in 2024. Presumably that means for project development work, rather than construction start, but even so, the portfolio of projects during the time period is likely beyond the capability of any entity or group of entities to undertake all at once. Perhaps some more light could be shed on how project would typically be implemented, and how much time projects of various types and in various locations might take.</p>	<p>We acknowledge your comments and appreciate the input. We understand the significant effort required to develop all the targeted projects outlined in Appendices 10.3 to 10.7. The mention of a 2024 start date primarily refers to the initiation of project development rather than the commencement of construction. We understand the challenges associated with the scale of human and institutional resources needed, as well as the physical network constraints, for implementing these projects. Given these factors, prioritization of projects based on various criteria, including resource availability and network readiness, is indeed essential.</p>
24	<p>PPA period of Cirebon-1 p.258 – App. 10.2. PLTU Cirebon-1 Natural retirement is stated as 2045 while PLN annual report 2022 stated PPA period of 2012-2042 (page.665), please kindly clarify the discrepancy. IEEFA has noted that on 13 November presentation by secretariat this has been corrected.</p>	<p>We acknowledge your comments and appreciate the input. The information has been revised in the updated CIPP document to align with the data presented in PLN's annual report.</p>
24	<p>Emissions from bioenergy. p.305 - Please confirm that emissions of 3.8million tonne CO2 per annum is generated from 18MW of power generation, or whether this table refer to both power generation and direct heat generation. The number is very high and comparable to an equivalent 500MW of coal power plant annual emissions.</p>	<p>We acknowledge your comments and appreciate the input. We will clarify this point to the relevant government.</p>

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General/Overall Comments and Remarks**

Public Submission Number	Comment**	JETP respond to comment
1	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.	Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Untuk CIPP versi 2024 kami akan memastikan bahwa glossarium akan diperlengkap melebihi dari keterangan singkatan yang kita telah masukan ke versi 2023
2	<p>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>	Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. JETP hanya salah satu upaya dari hal yang lebih esensial, yaitu transisi energi di Indonesia.
2	<p>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>	Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Monitoring dan evaluasi dilakukan melalui platform website JETP yang dapat di akses oleh setiap orang.
3	[In the attachment]	We acknowledge your comments and appreciate the input. Nuclear power is out of scope in JETP as we based our JETP scenario on the RUKN.
5	[In the attachment]	In terms of Just Energy Transition: -JETP focus on power sector, therefore, the

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		<p>e-waste etc. does not discuss in this CIPP.</p> <ul style="list-style-type: none"> -Community will be the one who will be considered in mitigation efforts. -Policy and roadmap for CFPP retirement are currently being discussed. Thank you for the input. -The safeguard standard have to comply as the lenders' requirements while in funding disbursement, selection processes and financial reporting. <p>On Financing: Financing for GFANZ will take place as atypical commercial lending, shaped and customized as per project basis. It will be difficult at this stage to present a more detailed financing breakdown. The JETP Secretariat will undertake meta-monitoring of fund disbursed to JETP projects and will present these in the JETP website in the future. We take note on your comments to conduct risk assessment for any political changes happening over the next few years, but we remain confident that each party will uphold its pledges despite changes in political situation.</p> <p>On Policy Reform: JETP Secretariat is not a government agency and does not represent any such agency. Therefore, the CIPP is not a policy document. The CIPP is a strategy document that can be used as a recommendation to the Government of Indonesia for power sector planning and policymaking as part of the JETP process.</p>
5	<p>Captive Power:</p> <ul style="list-style-type: none"> - Exclusion of captive power allows more time for planning but poses challenges. - Estimated annual emissions from captive coal power exceed targets, raising concerns. - Ember recommends reevaluating the decision to exclude captive power for goal achievement 	<p>We acknowledge your comments and appreciate the input. As mentioned in Appendix 10.17, we will conduct a further study to accomplish exactly what you have mentioned.</p>

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5	<p>Solar and Wind:</p> <ul style="list-style-type: none"> - Appreciation for increased renewable energy share to 44%. - Concerns about limited solar and wind development despite cost-effectiveness. - Calls for reassessment of model assumptions, increased solar targets, and reconsideration of wind focus areas 	We acknowledge your comments and appreciate the input.
5	<p>Bioenergy:</p> <ul style="list-style-type: none"> - Acknowledges bioenergy's increasing role but questions sustainability, technical feasibility, and economic viability. - Calls for a deeper investigation into potential challenges and risks associated with high reliance on bioenergy 	We acknowledge your comments and appreciate the input. As outlined in Appendix 10.17, a land use assessment is proposed as part of the further studies needed to address these challenges and risks
5	<p>Coal Retirement:</p> <ul style="list-style-type: none"> - CIPP delays coal retirement until after 2035, deviating from initial intent. - Discrepancy with Indonesian government's coal retirement plan raises concerns. - Ember suggests combining flexible coal fleet with full coal retirement scenario for comprehensive understanding 	We acknowledge your comments and appreciate the input. It is important to note that in the JETP model, certain coal-fired power plants (CFPP) are slated for retirement by 2030. This plan is contingent upon the availability of funding and pending decisions by the government. We are currently awaiting the release of a ministerial regulation that will provide a roadmap for the early retirement of CFPPs. Your input is valuable as we navigate these evolving policy landscapes.
6	<ul style="list-style-type: none"> - CIPP draft lacks focus on solar rooftops by the general public. - Public participation in solar rooftops crucial for significant emission reduction. - Recommends CIPP inclusion of policies removing barriers for public solar rooftop installatio 	We acknowledge your comments and appreciate the input. Currently, the CIPP does not specifically address rooftop solar PV for households. This topic is planned for discussion in the subsequent CIPP. However, the current CIPP does include considerations for rooftop solar PV in commercial and industrial contexts.
6	<p>Outlook Discrepancies:</p> <ul style="list-style-type: none"> - Highlights significant disagreements and discrepancies in long-term outlooks. - Advocates for a scenario-planning approach to address uncertainty in Indonesia's energy transition 	We acknowledge your comment and appreciate it. However, in order for us to provide an appropriate response, we would need clarification in relation to the context and objective of your query. We invite you to elaborate whenever convenient.
6	<p>Coal-fired Power Plants (CFPP) Retirement:</p> <ul style="list-style-type: none"> - Cautions against accelerated CFPP retirement for potential risks to electricity 	We acknowledge your comments and appreciate it

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	<p>supply.</p> <ul style="list-style-type: none"> - Advocates for a gradual phase-down reallocating funds to renewable energy (RE) development 	
6	<p>Captive Coal-Fired PP:</p> <ul style="list-style-type: none"> - Points out the absence of coverage for captive PLTU Batubara in the CIPP draft. - Expresses concern about achieving emission reduction targets with the growing carbon-intensive nickel industry 	<p>We acknowledge your comments and appreciate the input. As mentioned in Appendix 10.17, we will conduct a further study to accomplish exactly what you have mentioned.</p>
6	<p>Geothermal and Hydro Power Projects:</p> <ul style="list-style-type: none"> - Agrees on utilizing geothermal and hydro power for firm capacity. - Calls for realistic development periods and bankable feasibility studies for these projects 	<p>We acknowledge your comments and appreciate it</p>
6	<p>Emission Reduction Target in 2030:</p> <ul style="list-style-type: none"> - Recommends setting a more realistic emission reduction target of 290 Mt (34% RE share) by 2030. - Acknowledges the long lead-time for geothermal and hydro power projects 	<p>We acknowledge your comments and appreciate the input. It is important to note that this target is conditional. Regarding hydro power, we have identified potential based on a list of selected providers who already possess feasibility studies and location permits. For geothermal energy, reducing the lead time is crucial, and we anticipate that government intervention will play a key role in achieving this.</p>
6	<p>JETP Projects Not Listed in RUPTL:</p> <ul style="list-style-type: none"> - Raises concern about the inconsistency between CIPP priority projects and the current RUPTL. - Urges clarification on how these JETP projects will be executed 	<p>We acknowledge your comments and appreciate the input. It is important to note that the CIPP document is conditional and does not necessarily include all priority projects in the RUPTL. We appreciate your recommendation for a more realistic target of 290 Mt with a 34% renewable energy share by 2030, and we acknowledge the extended lead times required for geothermal and hydro power projects.</p>
6	<p>Inconsistent Numbers of VRE Development:</p> <ul style="list-style-type: none"> - Highlights inconsistencies in VRE project numbers and costs in the CIPP draft. - Requests underlying data and clarification on how the numbers were determined 	<p>We acknowledge your comment and appreciate it. However, in order for us to provide an appropriate response, we would need clarification in relation to the discrepancies you stated. We invite you to elaborate whenever convenient.</p>

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6	Lack of Grid Impact Assessment of VRE: - Advocates for a grid integration study in the CIPP draft to ensure stability and flexibility with high VRE integration	We acknowledge your comments and appreciate the input. As outlined in Appendix 10.17 of the CIPP draft, a grid impact study has been proposed to address this aspect
6	New Working Group on EE and Electrification: - Supports the establishment of a new working group on energy efficiency and electrification. - Recommends the inclusion of demand response strategies in Indonesia's electricity market	We acknowledge your comments and appreciate the input. The upcoming working group will indeed concentrate on energy efficiency. We plan to engage in consultations with relevant stakeholders to incorporate demand response strategies into Indonesia's electricity market
7	[In the attachment]	We acknowledge your comments and appreciate the input. The CIPP is living documents that we still received inputs for next CIPP iteration. Next, FPIC principles will be one of the requirement to conduct the stakeholder engagement. For the JETP's funding commitment, we note that the current proposed grant commitments presented in the JETP CIPP are less than ideal. They are however important to kick start the JETP. As JETP begins implementation, we could explore other sources of grants and that would be reflected in upcoming versions of the CIPP as it is a living document. Lastly, captive study will be conducted after the CIPP launching.
8	[In the attachment]	We acknowledge your comments and appreciate the input. We responded to your chapter specific comments in their respective sections.
9	[In the attachment]	For Just Transition: On Insufficient Human Rights Safeguards: This inputs already addressed in the CIPP, stakeholder engagement and FPIC principles are included in Chapter 6 For Technical: In terms of Captive coal, we acknowledge your comments and appreciate

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		<p>the input. As mentioned in Appendix 10.17, we will conduct a further study on captive power.</p> <p>On Unsuitable Emission Reduction Technologies: We acknowledge your comments and appreciate the input.</p> <p>On heavy loan reliance: We understand and agree, hence the prioritisation of public funding should be used for the most strategic power projects.</p>
9	<ul style="list-style-type: none"> - Enormous use of captive coal not counted in CIPP. - Misleading emission estimates endanger emission reduction targets. - Discrepancy of 65% between projected and baseline emissions. - Calls for inclusion of captive coal data in CIPP targets and objectives. - Criticizes delay in developing lower carbon pathways for off-grid industrial facilities. - Advocates for adopting existing renewable solutions instead of studying new technologies. - Urges the incorporation of specific provisions and joint targets for off-grid sector decarbonization 	<p>We acknowledge your comments and appreciate the input. As mentioned in Appendix 10.17, we will conduct a further study on captive power.</p>
10	<p>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>We acknowledge your comments and appreciate the input. Budget for overall energy transition in Indonesia under JETP scenario can be seen in Chapter 5</p>
11	<p>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. At present, these processes inadequately incorporate essential integrity checks required for banking purposes. A comprehensive three-point verification system is necessary:</p> <ol style="list-style-type: none"> 1. Resource checks and site-specific Meteorological Mast (Met Mast) or Solar Resource Assessment (SRA) data, with a requirement of data spanning over 36 	<p>We acknowledge your comments and appreciate the input. The JETP Secretariat will be conducting meta monitoring of financing flows but transactions will be arranged by each respective party. We believe each lender/financier will be conducting its own due diligence to determine project financial feasibility.</p> <p>We further have responded to your chapter</p>

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	<p>months to provide reliable and bankable resource assessments.</p> <p>2. Environmental, land, and permitting checks, assessing the progress, and conducting deliverability audits to address environmental and land-related issues, as well as permitting status.</p> <p>3. Technological checks involve an evaluation of grid capacity, ground conditions, and logistical considerations to ensure the deliverability of power plant components and buildability of site, which are pivotal for project feasibility.</p> <p>These INTEGRITY CHECKS are conspicuously absent in the current procedures and are indispensable for ensuring project bankability and facilitating financing. Therefore, their inclusion is imperative to enhance the robustness and credibility of the selection processes across these priority and investment lists. [Details in the attachment]</p>	<p>specific comments in their respective sections.</p>
12	<p>Indonesia has set ambitious targets for the transition to higher renewables in the market. Comments:</p> <p>1) There is no transition without transmission and transmission needs tremendous change to both connect renewables and maintain grid stability and security with low inertia.</p> <p>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>	<p>We acknowledge your comments and appreciate the input.</p> <p>1) This is a reason why we prioritize transmission as our first IFA</p> <p>2) Our 5th IFA makes sure that our local RE supply chain will be developed to anticipate it</p>
13	<ul style="list-style-type: none"> - Notes discrepancies in assumptions between JETP and other government policy documents. - Urges alignment of CIPP with the Directorate General of Electricity's roadmaps under ENDC and NZE2060. - Emphasizes the need for technical exchanges to address differences in emission drivers and mitigation strategies 	<p>Thank you for your feedback. We would like to clarify that the scenarios presented in the CIPP document are derived from RUKN, the official government pathway for the electricity sector. This is meant to ensure that the CIPP is in alignment with the government's established direction</p>
13	<ul style="list-style-type: none"> - Highlights the importance of addressing the energy demand and transport sector in JETP scenarios. - Stresses the need for more details on the energy used in the transport sector. - Discusses the impact of transport electrification and the increasing demand for low-carbon electricity 	<p>We acknowledge your comments and appreciate the input. As outlined in Section 5.2.1.1 of our modeling approach, the transport sector is indeed incorporated on the demand side. Additionally, the role of electric vehicles as a driver for electricity growth is acknowledged and factored into our analysis.</p>
14	<p>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</p>	<p>We acknowledge your comments and appreciate the input. We responded to your chapter specific comments in their respective sections.</p>

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	frameworks for efficient climate action. Enhancing clarity on the "just" aspect within the document could further strengthen its overall impact and effectiveness. [THIS IS JUST SUMMARY - 62 pages attachment overall]	
15	<p>First of all, thank you for sharing the draft Comprehensive Investment and Policy Plan (CIPP) document.</p> <p>Please find below our thoughts for your consideration when updating/finalizing the document with below highlights :</p> <ul style="list-style-type: none"> • Ensuring long-term financial stability for broader sets of stakeholders beyond PLN. This means to also include the Independent Power Producers (IPPs), Micro, Small and Medium-sized Enterprises (MSME), Industries and other major stakeholders which might be impacted by the Just Energy Transition. • To include transition plan for captive power plants and off-grid as this is important element for overall Indonesia NDC target. • Highlighting the prominent and roadmap to amplify the role of SMEs (Small and Medium Enterprises) in the Just Energy Transition Program • Proposing the feed-in Tariff mechanisms to meet the minimum economics threshold of Renewable Energy projects and in the same time encouraging investors to participate. • Implementation scheme of Power Wheeling to accelerate development of renewable project and transmission and distribution of its power generation to the end customers • Improvement of PPA terms that reflect international market best practice (such as application of BOO scheme and more-balanced carbon attribute allocation). • Highlighting the implementation roadmap for Carbon sink technologies, including the CCUS • Suggesting the implementation of new technologies to enhance energy efficiency, including the accelerated pathway to decarbonize few key sectors • Detailing out specific incentives to accelerate renewable energy value chain localization, particularly solar value chain (e.g., tax holiday / tax incentives, grants, expedited business licensing / regulatory requirements) • Procurement/tender process that accelerate renewable development projects. • Adding the list of renewable projects in the pipeline to include broader strategic projects 	We acknowledge your comments and appreciate the input. Specifically for CCUS, this would not be in the scope of JETP.
16	The success of JETP depends on the extent to which the government can reform its policies that align with the efforts for an accelerated and just energy transition in Indonesia.	We acknowledge your comments and appreciate the input. The CIPP is not a policy document. The CIPP is a strategy document that can be used as a recommendation to the

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	<p>The Joint Statement (agreed in Nov 2022, by the Government of the Republic of Indonesia and the Governments of Japan, the United States of America, Canada, Denmark, the European Union, the Federal Republic of Germany, the French Republic, Norway, the Republic of Italy, and the United Kingdom of Great Britain and Northern Ireland – together the “International Partners Group” or IPG), along with the Comprehensive Investment and Policy Plan or CIPP, do not constitute a legally binding document.</p> <p>Suggestion: 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>Government of Indonesia for power sector planning and policymaking as part of the JETP process. These recommendations are summarized in chapter 8 of the CIPP.</p>
17	<p>o According to IRENA’s report: Indonesia Energy Transition Outlook (IETO), The transition away from fossil fuels will help reduce the externality costs associated with air pollution and climate change. A broad view of the balance between the costs and benefits of the energy transition can be obtained by using estimates of externalities related to pollution and climate change and comparing them with transition costs, including investment, operation and maintenance expenditure and subsidies. The reduced externalities associated the 1.5-S yield an annual avoided cost of between USD 200 billion and USD 635 billion. This implies that the country can potentially save between USD 20 billion and USD 38 billion annually, or about 2%-4% of its current GDP by transitioning to a 1.5-degree scenario by mid-century.</p>	<p>We acknowledge your comments and appreciate the input.</p>
17	<p>o The core tenet of the JETPs should be to provide a higher share of grants and concessional financing. So far, the share of grants remains low and most of these are earmarked for technical assistance and feasibility studies, not for infrastructure or retirement of coal plants. The IPG needs to commit to a much higher share of grants to consider this a ‘Just’ financing package.</p>	<p>We acknowledge your comments and appreciate the input. The JETP and its stakeholders are exploring avenues for allocation of grants and concessional financing where possible.</p>
18	<p>The OECD Clean Energy Finance and Investment Mobilisation (CEFIM) Programme 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. [READ THE DETAILS in attachment]</p>	<p>We acknowledge your comments and appreciate the input.</p>
20	<p>Penyusunan dokumen CIPP JETP harus memenuhi prinsip keterbukaan dan prasyarat partisipasi yang bermakna (meaningful participation). Masyarakat sipil memiliki hak untuk didengar pendapatnya (rights to be heard), hak untuk dipertimbangkan pendapatnya (rights to be considered) dan hak untuk mendapatkan penjelasan atau jawaban atas pendapat yang diberikan (rights to be explained).</p>	<p>Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. CIPP bukan dokumen kebijakan atau regulasi pemerintah tapi akan menjadi masukan untuk pemerintah dalam hal kebijakan.</p>

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20	Pelibatan masyarakat sipil seharusnya dilakukan dari awal proses penyusunan dokumen CIPP. Organisasi masyarakat sipil perlu dilibatkan dalam setiap diskusi mengingat dan melibatkan masyarakat yang mungkin terdampak dengan adanya proyek. Pelibatan masyarakat sipil tidak boleh hanya dijadikan formalitas dalam proses penyusunan dokumen kebijakan tanpa adanya partisipasi aktif dan berarti.	Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. Civil society organization sudah dilibatkan pada awal penyusunan CIPP.
20	Menyediakan dokumen dalam bahasa indonesia merupakan sebuah prasyarat elemen keadilan, dokumen ini dibuat untuk transisi di indonesia sementara dokumen dalam bahasa indonesia baru tersedia dalam waktu yang sangat singkat. Bagaimana mereka yang terdampak terutama mereka yang termarginalkan bisa membaca dokumen dan memberikan masukan terhadap dokumen sementara akses terhadap dokumen berbahasa indonesia tidak ada. Sekertariat juga tidak memastikan dokumen utama dalam bahasa inggris atau indonesia?	Terima kasih atas komentar Anda dan kami menghargai masukan tersebut.
20	Legal standing position yang jelas untuk implementasi JETP. Tanpa ada regulasi untuk menetapkan bagaimana implementasi JETP, besar kemungkinan ini hanya akan menjadi proyek-proyek percontohan transisi energi, seperti halnya proyek lain. Regulasi ini dapat berupa peraturan pemerintah.	Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. CIPP bukan dokumen kebijakan atau regulasi pemerintah tapi akan menjadi masukan untuk pemerintah dalam hal kebijakan
20	Perlu adanya turunan kebijakan di level mikro (daerah). Hal ini untuk memastikan adanya ketentuan hukum yang jelas untuk implementasi JETP di daerah. Ini juga untuk mendukung peran dan kontribusi masyarakat di level tapak untuk mendapatkan manfaat (implementasi prinsip 'just'/berkeadilan).	Terima kasih atas komentar Anda dan kami menghargai masukan tersebut. CIPP bukan dokumen kebijakan atau regulasi pemerintah tapi akan menjadi masukan untuk pemerintah dalam hal kebijakan
21	<ul style="list-style-type: none"> • Prepare a plan to phase out captive coal power plants over the same timeline as grid-connected coal power. • Prepare a plan to retire all coal power units whose operating life will exceed 30 years by 2035, in line with the 30-year maximum lifetime assumed in the plan. • Increase the targets for solar and wind to economically optimal levels, without setting artificial limits. • Strengthen Indonesia's air pollutant emissions limits for coal power plants, noting that the current limits are very lax, causing severe public health impacts throughout the transition decades when coal power phase-out occurs under current plans. 	<p>We acknowledge your comments and appreciate the input:</p> <ul style="list-style-type: none"> • Study on captive power will be conducted as per Appendix 10.17 • PLN is drafting early retirement plan for CFPP • Target will be adjusted based on RUKN • Not part of JETP scope but reduction of electricity production from CFPP will bring positive impact towards air pollution reduction
25	<ul style="list-style-type: none"> • Inclusive stakeholder engagement: Ensure that the Just Energy Transition Partnership actively engages with a diverse range of stakeholders, including local communities, marginalized groups, civil society organizations, and affected industries. This can be achieved through public consultations, participatory 	We acknowledge your comments and appreciate the input. We responded to your chapter specific comments in their respective sections.

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	<p>decision-making processes, and capacity-building initiatives.</p> <ul style="list-style-type: none"> • Social and economic considerations: Place a strong emphasis on social justice and economic equity in the energy transition. This can involve prioritizing job creation in clean energy sectors, supporting skill development and retraining programs for workers in affected industries, and ensuring affordable access to clean energy for all segments of society. • Policy coherence and long-term planning: Advocate for comprehensive policy frameworks that integrate energy transition strategies across various sectors. This includes aligning energy policies with climate goals, promoting renewable energy investments, and providing support mechanisms for affected industries and communities during the transition. • Implementation of the Just Transition Framework in Indonesia could further delve into the role of technology in facilitating a just transition. For example, it could explore how digital technologies and data analytics can be used to monitor the implementation of the Just Transition Framework and track its impacts. It could also discuss how technology can be used to enhance access to information and promote transparency, which are key aspects of the framework. • JETP must have a strategy on how to involve young people in supporting the development renewable energy • Restrain additional coal fired power plants, and make the way for coal power to play a smaller part. • Indonesia should guarantee that the transmission funds required to integrate renewable sources into the grid are realized and carefully coordinated with generation-expansion plans. • Before decreasing the fossil fuels or coal phase, the new electricity or energy should be installed into the grid to complete the fall short of the electricity. • The parties that will be affected are also not clearly explored, and the criteria for areas that are targeted by a just transition project by providing examples, this will also risk cultural, local, and misunderstanding conflicts in the communities affected by a just transition. The Document must cover the foundational concepts and definition of just transition for Indonesia, namely human rights, gender equality and empowerment, Cultural heritage; displacement and resettlement; Local and customary communities. • The document should provide an overview or prediction, and an example of the required financing budget with the concept of a case or project that has been or will be carried out. To achieve the target of implementing a just transition that prioritizes accountability, economic diversification and transformation, and driving economic diversification as described in the concepts of implementing a just transition. 	
25	<p>Before decreasing the fossil fuels or coal phase, the new electricity or energy should be installed into the grid to complete the fall short of the electricity</p>	<p>We acknowledge your comments and appreciate the input.</p>

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27	[In the attachment]	<p>We acknowledge your comments and appreciate the input.</p> <ul style="list-style-type: none"> - The focus of the JETP program is on power not coal mining sector. We will give this recommendation to the government directly - Community based projects are not part of JETP scope but we highly encourage it as part of Indonesia energy transition journey - In terms of CFPP Asset Development Plant evaluation we will communicate this with DJK and PLN - For Just Transition grants this acts as an investment prospectus
27	<ul style="list-style-type: none"> - Acknowledgment of Indonesia's high electrification ratio but emphasis on the need for improved energy quality. - JETP urged to enhance sustainable energy access, especially for small-scale renewable projects at the community level 	<p>We acknowledge your comments and appreciate the input. Your points regarding the need for improved energy quality and enhancing sustainable energy access, particularly for small-scale renewable projects at the community level, are well noted and form a crucial part of our risk assessment process. We have proposed further assessments to address these concerns, as briefly outlined in sub-chapters 6.2.2.1 and 7.2.1 of the CIPP.</p>
27	<p>Increased Grants for Just Transition:</p> <ul style="list-style-type: none"> - Equitable Transition aspect in CIPP JETP draft is valued at USD 353 million, less than 2% of total funds. - Concerns raised about the high reliance (92%) on concessional loans, given Indonesia's increased debt-GDP ratio. - Urgency for grant funding, considering the non-profit nature of socio-economic development programs like energy infrastructure projects." 	<p>We acknowledge your comments and appreciate the input. We note the need for more allocation for just transition financing and grants. The current proposed grant commitments presented in the JETP CIPP are important as the kick start of the JETP mandate. As this JETP evolves, additional grant funding could be considered. This JETP could explore other sources of grants and that would be reflected in upcoming versions of the CIPP as it is a living document.</p> <p>Re. concerns on high reliance on concessional loans, we understand and</p>

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		agree, hence the prioritization of public funding should be used for the most strategic power projects.
28	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. [SEE ATTACHMENT]	<p>We acknowledge your comments and appreciate the input.</p> <ul style="list-style-type: none"> - On captive coal, study will be conducted in the future as per Appendix 10.17 - Not all energy intensive industry offered potential connection to the grid due to the remote location - Nuclear is not part of the JETP scope - Worker inclusivity is already addressed in the Just Transition framework
29	<p>The glaring issue in this plan is the exclusion of a significant portion of Indonesia’s future coal capacity: “captive” coal-fired power.</p> <p>While the decommissioning and early retirement of coal power assets is vital for people and climate, this process is undermined by the fact that almost 30GW of current and future captive coal-fired power capacity will remain untouched under present plans. This pipeline dwarfs the capacity under discussion in this early retirement mechanism.</p> <p>Part of the issue is the tiny proportion of grants that make up the JETP’s dedicated USD \$20bn (itself about a fifth of the total ~USD \$100bn required financing identified by the JETP). More concessional financing, for example lower thresholds for triggering UK and US financing, would help to alleviate the potential debt burden on Indonesia.</p> <p>GFANZ members that have committed half of all the funds earmarked in the JETP process could contribute to making up this shortfall. These banks – Bank of America, Citi, Deutsche Bank, HSBC, Macquarie, MUFG, and Standard Chartered – have profited enormously from the development of coal-fired power and other fossil fuel infrastructure in Indonesia or across the Asia-Pacific region.</p> <p>9 November 2023</p>	<p>We acknowledge your comments and appreciate the input. We will further address captive coal generation and capacity in the future version of the CIPP after we have conducted further study in the matter as mentioned in Appendix 10.17</p>

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