CHRISTIAN TEO & PARTNERS
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RENEWABLE ENERGY – SOME PROGRESS BUT KEY REQUIREMENT STILL MISSING[1][2][3][4][5]

INTRODUCTION

Indonesia has made some recent progress in promoting the development of renewable energy as a viable alternative to coal.

The key requirement for large scale renewable energy development in Indonesia, however, is still missing. Unless and until there is a commercial tariff for the State Electricity Company's purchase of electricity generated from renewable energy, Indonesia can never realistically expect to achieve its potential as a leader in renewable energy development.

In this article, the writer will review the recent progress that has been made in promoting the development of Indonesia's renewable energy resources before turning to the importance of and the prospects for a commercial tariff to move that development to the next level.

BACKGROUND

1. Renewable Energy Potential

Much has been said and written about Indonesia's potentially vast renewable energy resources including solar, wind, hydro, biomass, biogas, city waste, geothermal and tidal energy (together, "**Renewable Energy Resources**").

The Ministry of Energy & Mineral Resources ("**ESDM**") has estimated that Indonesia has Renewable Energy Resources equivalent to (i) 28.5 GW from geothermal energy, (ii) 75 GW from hydro energy, (iii) 32 GW from biofuel energy, (iv) 207 GW from solar energy and (v) 60 GW from wind energy. Yet, to date, Indonesia has only managed to utilize a tiny fraction of its Renewable Energy Resources.

Indonesia's extremely modest utilization of its Renewable Energy Resources is despite the fact the country now has a reasonably comprehensive policy and regulatory framework in place for the development of its Renewable Energy Resources. This policy and regulatory framework includes:

(a) Government Regulation 79 of 2014 re National Energy Policy ("**NEP**") ("**GR 79/2014**") which sets out Indonesia's NEP being:

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[1] Bill Sullivan, Senior Foreign Counsel with Christian Teo & Partners and Senior Adviser to Stephenson Harwood LLP.

[2] Bill Sullivan is the author of "*Mining Law & Regulatory Practice in Indonesia – A Primary Reference Source*" (Wiley, New York & Singapore 2013), the first internationally published, comprehensive book on Indonesia's 2009 Mining Law and its implementing regulations.

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[5] An earlier version of this article appeared in the July – August 2020 edition of Coal Asia Magazine.

(i) energy independence;

(ii) energy security;

(iii) achieved through the application of equitable, sustainable and environmentally sound practices;

(iv) for the maximum benefit of the people;

(v) not later than 2050; and

(vi) in a manner that favors domestic companies;

(b) Presidential Regulation No. 22 of 2017 re National Energy General Plan ("**NEGP**") ("**PR 22/2017**") which:

(i) has been issued as an implementing regulation of GR 79/2014 in order to facilitate the realization of NEP objectives;

(ii) serves as the guideline for Provincial/ Regional Governments in drafting their own Regional Energy General Plans;

(iii) provides for the renewable energy utilization targets of:

a. >23% by 2025; and

b. >31% by 2050;

(iv) is effective until 2050; and

(v) may be amended every 5 years;

(c) Minister of Energy & Mineral Resources ("**MoEMR**") Decision No. 143K/20/MEM/2019 re NEGP for Years 2019 to 2038 which details:

(i) national electricity policy;

(ii) development plan for electricity supply;

(iii) current and projected electricity demand/supply; and

(iv) required capital investment in electricity supply to meet current and projected demand;

(d) Presidential Regulation No. 4 of 2016 re Electricity Infrastructure Acceleration, which stipulates that (i) electricity infrastructure must prioritize the utilization of Renewable Energy Resources and (ii) Regional Governments may provide incentives and required permits as well as determine the purchase price of the electricity to be used in their administrative areas;

(e) Presidential Regulation No. 66 of 2018 re Second Amendment of Presidential Regulation No. 61 Year 2015 re the Collection and Utilization of Palm Oil Plantation Funds, which mandates the use of biodiesel;

(f) MoEMR Regulation No. 49 of 2017 re Main Provisions of Power Purchase Agreements ("**PPAs**");

(g) MoEMR Regulation No. 50 of 2017 re Replacement of MoEMR Regulation No. 12 of 2017 re Utilization of Renewable Energy Resources for Procurement of Electricity ("**MoEMRR 50/2017**");

(h) MoEMRR Regulation No. 53 of 2018 re First Amendment to MoEMRR 50/2017; and

(i) MoEMRR No. 4 of 2020 re Second Amendment to MoEMRR 50/2017 ("**MoEMRR 4/2020**").

2. Constraints on Renewable Energy Resource Development

Numerous reasons can be advanced for why Indonesia has made only very modest progress, to date, in developing and utilizing its Renewable Energy Resources. Some of these reasons include:

(a) the existing pricing structure or tariff for electricity generated from Renewable Energy Resources is not commercial;

(b) the previous requirement to transfer, with no compensation payable, ownership of plants generating electricity from Renewable Energy Resources ("**RE Power Plants**") to the State Electricity Company ("**PLN**") at the end of the term of the relevant PPA (otherwise known as "build own, operate and transfer" or "**BOOT**") ("**BOOT Requirement**").

(c) the licensing system for RE Power Plants is overly complicated;

(d) there are unresolved spatial planning issues in building RE Power Plants;

(e) there are few incentives for the development and utilization of Renewable Energy Resources by independent power producers ("**IPPs**");

(f) the Central Government still provides subsidies for electricity generated from coal in the form of the domestic market coal supply obligation and a maximum selling price for coal supplied to PLN for electricity generating purposes;

(g) depending upon the particular Renewable Energy Resource, the development and utilization of the same can require expensive technology; and

(h) there is insufficient financing available for RE Power Plants due to the often poor economics of RE Power Plants.

Although each of the above identified reasons has contributed to the relative lack of progress in developing and utilizing Indonesia's Renewable Energy Resources, it is unquestionably the absence of a commercial pricing structure or tariff for electricity generated from Renewable Energy Resources that is the most significant problem ("**NC Tariff Problem**").

The history of the NC Tariff Problem is long and complicated. The NC Tariff Problem, however, has its origins in the following two principles which presently still determine the price PLN pays for electricity generated from Renewable Energy Resources:

(a) where the base cost of electricity production in a particular region of Indonesia only (otherwise commonly known as the "local grid price") ("**Regional BPP**") is higher than the average base cost of electricity production across all regions of Indonesia ("**National BPP**"), the **maximum** electricity purchase price payable by PLN will be 85% or 100% of Regional BPP depending upon the particular Renewable Energy Resource; and

(b) where Regional BPP is not more than National BPP, the electricity purchase price payable by PLN shall be directly negotiated and agreed between PLN and the relevant IPP (together, "**BPP Pricing Strategy**").

Readers interested in knowing more about the BPP Pricing Strategy, its history and why it is such an obstacle to the development of Indonesia's Renewable Energy Resources are referred to the writer's previous articles on this subject being (i) "*Encouraging the Use of Coal Alternatives – New BPP Pricing Strategy* ", Coal Asia Magazine, March - April 2017, Petromindo and (ii) "*Rethinking the Use of Coal Alternatives – Changes to Renewable Energy Regulation*", Coal Asia Magazine, October – November 2017, Petromindo.

ANALYSIS AND DISCUSSION

1. Signs of Progress

The Central Government has recently shown a willingness to be more proactive in encouraging the development and utilization of Indonesia's Renewable Energy Resources. This has led to serious consideration by ESDM of a variety of initiatives/proposals including to:

(a) establish an independent business entity to develop and utilize Renewable Energy Resources and/or buy electricity from RE Power Plants;

(b) draft guidelines on subsidization of energy including Renewable Energy Resources;

(c) appoint a financial institution to be responsible for financing projects to develop and utilize Renewable Energy Resources;

(d) adopt/implement a so-called "feed-in tariff" for electricity generated from Renewable Energy Resources;

(e) allocate a budget for the construction of infrastructure required for the development; and utilization of Renewable Energy Resources; and

(f) develop a small-scale electric power system based on the use of electricity generated from Renewable Energy Resources in order to ensure power supply in remote areas.

Indonesia also has a newly appointed **acting** Director General of Minerals & Coal, Mr. Rida Mulyana, who has a reputation for both being capable and very much in favour of the expedited development and utilization of the country's Renewable Energy Resources as evidenced by his performance in his previous position as Director General of Electricity. The acting Director General's commitment to the development and utilization of Renewable Energy Resources can already be seen in the number of new solar energy projects that are moving forward.

While the long promised feed-in tariff and most of the other proposals outlined above have yet to become a reality, the issuance of MoEMRR 4/2020 has been an important and recent step forward in encouraging the development and utilization of Indonesia's Renewable Energy Resources.

MoEMRR 4/2020 came into force on 26 February 2020.

2. Major Changes Introduced by MoEMRR 4/2020

2.1 **Greater Use of IPP Direct Appointment**: PLN is now allowed to purchase electricity, generated from Renewable Energy Resources, on the basis of direct appointment rather than direct selection (**i.e.**, tender) in the following situations:

(a) the local electricity system is in a critical or emergency condition;

(b) there is excess electricity available in a particular business area, which excess electricity may be purchased by various means including through cooperation with the business area IPP;

(c) it is desirable/necessary to increase the capacity of an existing RE Power Plant operating in a particular business area; and/or

(d) there is only one IPP operating a RE Power Plant in a particular business area (Article 4(1)(a) of MoEMRR 4/2020).

Direct appointments must be completed within 90 days compared to 180 days for direct selection (Article 4(1)(c) of MoEMRR 4/2020).

Direct appointment is generally more cost and time efficient, from the perspective of IPPs, than is direct selection. As such, the greater use of direct appointment, in the case of the purchase of electricity generated from Renewable Energy Resources, makes it more attractive for IPPs to invest in RE Power Plants.

2.2 **Extension of PLN Must Run Obligation**: The previous 10MW cap on RE Power Plants that PLN is obliged to ensure the continuous operation of on a "must run" basis has been dropped (Article 4(3) of MoEMRR 4/2020. As a consequence and assuming the "must run" obligation is to be interpreted and applied literally, PLN is now under an obligation to ensure the continuous operation of **all** RE Power Plants.

Considerable caution is probably warranted, however, in trying to understand the true scope of PLN's newly extended "must run" obligation. First, there is no detail provided as to just what PLN must do in order to ensure the continuous operation of all RE Power Plants. Second, no penalties or sanctions are imposed on PLN if, for whatever reason, it is not willing or able to ensure the continuous operation of some RE Power Plants. As such, the extended "must run" obligation should perhaps be seen as more of a statement of principle and as evidence of commitment, in theory, to support existing RE Power Plants rather than as an obligation imposed on PLN to take particular actions such as purchasing all the electricity produced by RE Power Plants regardless of cost and need.

2.3 **Expansion of PLN Purchase Obligation**: PLN's obligation to purchase electricity generated by those RE Power Plants utilizing solar or wind energy was previously subject to 3 conditions being (i) the local grid system is able to connect to RE Power Plants generating electricity from solar or wind energy, (ii) the purchase of electricity originating from solar or wind energy is intended to reduce Regional BPP and/or (iii) the purchase of electricity originating from solar or wind energy helps meet electricity demand in locations where there are no other primary energy sources. Conditions (ii) and (iii) have now been removed such that the only remaining pre-condition to PLN's obligation to purchase electricity, generated by RE Power Plants utilizing solar or wind energy, is that the local grid system is able to connect to RE Power Plants generating electricity from solar or wind energy as the case may be (Article 5(1) of MoEMRR 4/2020).

Reducing the number of pre-conditions to PLN's obligation to purchase electricity generated by RE Power Plants, utilizing solar or wind energy, clearly has the potential to assist in promoting the use of electricity generated by RE Power Plants, utilizing solar or wind energy, by making it more difficult for PLN to take the position that it is not obliged to purchase such electricity.

It is notable, however, that no penalties or sanctions are imposed on PLN if it does not, for whatever reason, purchase electricity generated by RE Power Plants, utilizing solar or wind energy, and even though the local grid system is able to connect to RE Power Plants generating electricity from solar or wind energy. Accordingly, it must be questioned how effective, in practice, this change will be in promoting the use of solar and wind energy.

2.4 **Scrapping of BOOT Requirement**: IPPs are no longer required to transfer, without compensation, ownership of their RE Power Plants to PLN at the end of the term of the relevant PPA (Article 5(6), 6(6), 7(8), 8(6), 9(6), 11(6), 12(5), 12(a)(4) of MoEMRR 4/2020). This applies to all IPPs regardless of what Renewable Energy Resource is used by a particular RE Power Plant.

The scrapping of the BOOT Requirement improves the potential return on investment for RE Power Plants by creating the prospect of longer commercial operating periods. This makes it more attractive for IPPs to invest in RE Power Plants. The scrapping of the BOOT Requirement should also make it easier to obtain third party financing for RE Power Plants as prospective lenders can look forward to longer revenue streams being available to IPPs for the purpose of servicing and repaying their loans.

2.5 **Recognition of New Renewable Energy Resource**: Hydro energy generated by water in dams or reservoirs, constructed for multiple purposes, has been recognized as a new Renewable Energy Resource for the first time and separate from the long recognized Renewable Energy Resource of hydro energy generated by rivers, streams and waterfalls (Article 7(2) of MoEMRR 4/2020).

The belated recognition of hydro power, generated by water in dams or reservoirs, as an independent Renewable Energy Resource makes it possible to "tailor" the regulatory environment in a way that recognizes and addresses the particular issues faced by IPPs wanting to develop and utilize this form of hydro energy but not necessarily by IPPs wanting to develop and utilize hydro energy generated by rivers, streams and waterfalls. If handled correctly, the possibility of a more "tailored" regulatory environment should encourage greater investment in RE Power Plants relying upon hydro energy in either form.

2.6 **Clarification of Electricity Purchase Requirement for City Waste Energy**: The circumstances in which and the conditions under which PLN is obliged to purchase electricity generated by RE Power Plants, utilizing city waste energy, have been clarified. Previously, PLN was simply obliged to purchase electricity generated by RE Power Plants, utilizing city waste energy, "*in accordance with the prevailing laws and regulations*". MoEMRR 4/2020 now, however, provides that PLN's purchase of electricity generated by RE Power Plants, utilizing city waste energy, shall be the subject of an assignment from MoEMR to PLN to purchase electricity from IPPs which been approved/appointed, as city waste energy developers, by local governments in accordance with relevant laws and regulations (Article 10(3) of MoEMRR 4/2020).

MoEMR's assignment to PLN amounts to (i) a direct appointment of the relevant city waste energy developer/IPP and (ii) approval of the electricity purchase price payable by PLN to the relevant city waste energy developer/IPP (Article 10(3)(a) of MoEMRR 4/2020).

Given the amount of waste generated by Indonesia's cities and the consequent importance of making the best possible use of the energy potential represented by this waste, clarifying the rules related to the purchase of electricity generated by RE Power Plants, utilizing city waste energy, is a positive development. Without this clarification, IPPs would be unlikely to take seriously the potential business opportunity represented by city waste energy.

2.7 **Introduction of Timeline for MoEMR Electricity Purchase Price Approval**: Where (i) Regional BPP is less than or equal to National BPP and (ii) the purchase price for electricity generated by RE Power Plants has to be agreed between the relevant IPP and PLN before being submitted to MoEMR for approval. MoEMR is now obliged to approve/not approve the agreed electricity purchase price within a maximum of 5 days of the agreed price being submitted to MoEMR (Article 14(2) of MoEMRR 4/2020).

The inclusion of a timetable for MoEMR approval is of some benefit in reducing the previous risk of an indefinite delay between (i) a PPA being concluded between an IPP and PLN and (ii) MoEMR approving/refusing approval of the agreed price. This previous uncertainty may have discouraged prospective IPPs from investing in RE Power Plants on the basis that the development and utilization of Renewable Energy

Resources was simply "too hard" and, therefore, should be avoided in favor of more certain investment opportunities.

It is important to note, however, that there is **no** consequence of or penalty if MoEMR, in fact, does not approve/withhold his approval of the agreed electricity price within 5 days. More particularly, MoEMRR 4/2020 does **not** provide that the agreed electricity purchase price is automatically approved if there is no decision forthcoming from MoEMR within 5 days. As such, the practical effectiveness of the newly introduced timeline must be questioned.

2.8 **Improved Supervision**: PLN must forward to MoEMR (i) a copy of each PPA signed by it with an IPP and (ii) within 5 days of the signing taking place (Article 18(a)(2) of MoEMRR 4/2020).

IPPs must now report (i) to MoEMR, (ii) the implementation progress of the construction of RE Power Plants, (iii) every 3 months from the date of signing of the relevant PPA until the date of commencement of commercial operation, (iv) with a copy of each report being sent to the Director-General of New and Renewable Energy and Energy Conservation, the Director-General of Electricity and the Board of Directors of PLN and (v) through an online system or, if the online system is not available, manually in writing (Article 18(a)(3) of MoEMRR 4/2020).

Increased supervision by MoEMR of PLN's dealings with IPPs and the construction progress of RE Power Plants is to be welcomed given PLN's historical reluctance to prioritize the development and utilization of Renewable Energy Resources. The effectiveness of this increased supervision will, of course, depend very much upon how seriously this increased supervisory role is taken by MoEMR.

2.9 **Updating BPP Pricing Strategy**: The BPP Pricing Strategy has been updated to reflect the other changes introduced by MoEMRR 4/2020.

The current BPP Pricing Strategy, post the issuance of MoEMRR 4/2020, may be summarized as follows:

Renewable Energy Resource	PLN Electricity Purchase Price	
	Regional BPP > National BPP	Regional BPP ≤ National BPP
Solar (PLTS Photovoltaic)	Maximum 85% x Regional BPP	Determined based on agreement between IPP and PLN as subsequently approved by MoEMR.
Wind (PLTB)	Maximum 85% x Regional BPP	Determined based on agreement between IPP and PLN as subsequently approved by MoEMR
Hydro (PLTA)	Maximum 100% x Regional BPP (**i.e.**, equal to Regional BPP)	Sumatra, Java, Bali and any other area where Regional BPP is not more than National BPP - determined based on agreement between IPP and PLN as subsequently approved by MoEMR

Renewable Energy Resource	PLN Electricity Purchase Price	
	Regional BPP > National BPP	Regional BPP ≤ National BPP
Hydropower from dams/reservoirs	Determined based on agreement between IPP and PLN as subsequently approved by MoEMR	Determined based on agreement between IPP and PLN as subsequently approved by MoEMR
Biomass (PLTBm)	Maximum 85% x Regional BPP	Determined based on agreement between IPP and PLN as subsequently approved by MoEMR
Biogas (PLTBg)	Maximum 85% x Regional BPP	Determined based on agreement between IPP and PLN as subsequently approved by MoEMR
City Waste (PLTSa)	Maximum 100% x Regional BPP (**i.e.**, equal to Regional BPP)	Sumatra, Java, Bali and any other area where Regional BPP is not more than National BPP - Determined based on agreement between IPP and PLN as subsequently approved by MoEMR
Geothermal (PLTP)	Maximum 100% x Regional BPP (**i.e.**, equal to Regional BPP)	Sumatra, Java, Bali and any other area where Regional BPP is not more than National BPP - Determined based on agreement between IPP and PLN as subsequently approved by MoEMR
Tidal (Ocean PLTA)	Maximum 85% x Regional BPP	Determined based on agreement between IPP and PLN as subsequently approved by MoEMR
Liquid Biofuel (PLT BBN)	Determined based on agreement between IPP and PLN as subsequently approved by MoEMR	Determined based on agreement between IPP and PLN as subsequently approved by MoEMR

IPPs, contemplating the possibility of investing in RE Power Plants, utilizing solar, wind, biomass, biogas or tidal energy and where Regional BPP is greater than National BPP, are still subject to a maximum electricity purchase price of 85% of Regional BPP. **This has not changed since 2017 when MoEMRR 50/2017 was issued**. It must be assumed that IPPs, looking at the possibility of investing in RE Power Plants utilizing these types of Renewable Energy Resources, will lack adequate incentives to do so in any region where Regional BPP is greater than National BPP.

In the case of IPPs, contemplating the possibility of investing in RE Power Plants, utilizing hydro energy from dams/reservoirs or liquid biofuel energy and where Regional BPP is greater than National BPP, the prospect of an open-ended negotiation of the electricity purchase price with PLN is a "two-edged sword" at best. While the absence of any specified maximum purchase price **might** imply a high degree of discretion and flexibility on the part of PLN as to what electricity price it can agree to, it also creates great uncertainty for IPPs, looking at the possibility of investing in RE Power Plants utilizing these types of Renewable Energy Resources, as to what electricity price PLN may ultimately be willing to accept. It also seems

reasonable to assume that PLN will never agree to an electricity price, in the case of these types of Renewable Energy Resources, that is higher than Regional BPP. Accordingly, the negotiation risk faced by IPPs, contemplating the possibility of investing in RE Power Plants utilizing these types of Renewable Energy Resources, is very arguably "all on the downside".

IPPs, contemplating the possibility of investing in RE Power Plants, utilizing hydro (PLTA), city waste or geothermal energy and where Regional BPP is greater than National BPP, are certainly better treated, in terms of electricity pricing, than IPPs contemplating the possibility of investing in RE Power Plants utilizing other Renewable Energy Resources. However, there is still no assurance that an electricity price equal to a **maximum** of 100% X Regional BPP will necessarily provide adequate incentives to develop RE Power Plants utilizing hydro (PLTA), city waste or geothermal energy. This is because the relevant Regional BPP will have been determined on the basis of a local grid price that, to a very large degree, reflects the cost of electricity generated by coal fired power plants as the dominant energy source in most regions of Indonesia. The relationship between the cost of electricity generated by coal fired power plants and the cost of electricity generated by power plants utilizing Renewable Energy Resources is tenuous at best.

Having regard to the foregoing, MoEMRR 4/2020 has done very little to overcome the long standing problem created by the BPP Pricing Strategy in terms of not providing an electricity pricing structure that properly reflects the costs of constructing/operating RE Power Plants and otherwise generating electricity from Renewable Energy Resources.

3. Prospects for Long Promised Feed-in Tariff

A new regulation, setting out a much improved and more commercial tariff for electricity generated from Renewable Energy Resources has been promised since 2019 and various drafts of the same have been circulated. It seems, however, that the fate of the promised new regulation is inexorably tied to the state of the Indonesian economy, the state of the Central Government's fiscal position and the state of PLN's finances, all of which have only gone from bad to worse to terrible in 2020.

The Covid 19 induced economic crisis now facing Indonesia, together with the associated fiscal crisis now facing the Central Government, may well mean that the long promised regulation providing for a commercial feed-in tariff, for electricity generated by RE Power Plants, does not become reality any time soon.

Requiring PLN to pay commercial tariffs for electricity generated by RE Power Plants would, inevitably, mean that PLN (i) needs more financial support, rather than less financial support, from the Central Government and (ii) is less able to provide heavily subsidized electricity to vulnerable households and businesses.

At a time when the Central Government is focused on getting financial assistance to the newly unemployed and disadvantaged as a result of Covid-19, it would be understandable (albeit shortsighted) if the Central Government was to see promoting the greater development and utilization of Indonesia's Renewable Energy Resources as a lesser priority to be revisited once the current economic, financial and fiscal crises are overcome.

The risk of social unrest is also never far away in Indonesia. Accordingly, while the Central Government unquestionably recognizes the importance of promoting the development and utilization of Indonesia's Renewable Energy Resources, it can scarcely be doubted that avoiding social unrest is a much bigger priority for the Central Government at this time. Providing generous financial assistance and continued, heavily subsidized electricity to vulnerable households and businesses is a well established approach, in Indonesia, to "keeping the lid on" social unrest.

SUMMARY AND CONCLUSIONS

MoEMRR 4/2020 has introduced important changes to the regulatory environment for electricity generated by RE Power Plants. These changes go **some** way to making it more attractive for IPPs to invest in RE Power Plants and otherwise encourage the greater development and utilization of Indonesia's Renewable Energy Resources.

MoEMRR 4/2020, however, has done little if anything to overcome the long standing weaknesses of the BPP Pricing Strategy in terms of the inadequate financial incentives it provides to build RE Power Plants and otherwise develop and utilize Indonesia's Renewable Energy Resources.

The long promised regulation, introducing a commercial feed-in tariff for electricity generated by RE Power Plants, is needed more than ever if Indonesia is to realize its full potential in terms of the development and utilization of its Renewable Energy Resources.

The interlinked economic, financial and fiscal crises rapidly unfolding in Indonesia, however, probably mean that a commercial feed-in tariff, for electricity generated by RE Power Plants, is something for the future only and is not likely to "see the light of day" in 2020 and, possibly, not even in 2021.

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This article was written by Bill Sullivan, Senior Foreign Counsel with Christian Teo & Partners and Senior Adviser to Stephenson Harwood LLP. Christian Teo & Partners is a Jakarta based, Indonesian law firm and a leader in Indonesian energy, infrastructure and mining law and regulatory practice. Christian Teo & Partners operates in close association with international law firm Stephenson Harwood LLP which has nine offices across Asia, Europe and the Middle East: Dubai, Hong Kong, London, Paris, Piraeus, Seoul, Shanghai, Singapore and Yangon.

Get in touch

Bill Sullivan

T: +62 21 5020 2789
M: +62 815 8506 0978
E: bsullivan@cteolaw.com

Christian Teo

T: +62 21 5020 2789
M: +62 818 124 747
E: cteo@cteolaw.com

Claudius Novabianto

T: +62 21 5020 2789
M: +62 818 0858 9235
E: cnbianto@cteolaw.com