

## POWER PLANTS AND CARBON TRADING – NEW RULES <sup>12345</sup>

### INTRODUCTION

Power plants, using fossil fuels, are a significant source of greenhouse gas emissions in Indonesia.

Given the above, it is understandable that the Government has decided to prioritize the use of carbon trading, in respect of power plants, as a means of helping to control greenhouse gas emissions in the energy sector. To this end, the Minister of Energy & Mineral Resources has recently issued a regulation on the use of carbon trading in the power plant sub-sector.

In this article, the writer will review the main provisions of the new regulation on the use of carbon trading, in the power plant sub-sector, before looking at how the prioritization of carbon trading, in the power plant sub-sector, fits into Indonesia's overall promotion of carbon trading as part of the solution to the problem of greenhouse gas emissions.

### BACKGROUND

In late October 2021, Presidential Regulation No. 98 of 2021 re Implementation of Carbon Economic Value to Achieve Updated National Development Contribution (NDC) and Net Zero Emissions (NZE) in National Development (**PR 98/2021**) was issued.

Among other things, PR 98/2021 outlines the broad parameters of Indonesia's approach to Climate Change Mitigation and Climate Change Adaptation through the implementation of the concept of Carbon Economic Value or "*Nilai Ekonomi Karbon*" (**NEK**).

PR 98/2021 makes clear that the implementation of NEK is to be realized through a combination of (i) **Carbon Trading**, (ii) performance based payments, (iii) charges on carbon and (iv) other mechanisms reflecting the development of science and technology.

Carbon Trading comprises both (i) Emissions Trading and (ii) Emissions Offsetting.

PR 98/2021, however, provides only the most basic outline of the intended mechanics of Carbon Trading, with all the detail to follow in a series of ministerial regulations.

On 20 October 2022, the Minister of Environment & Forestry (**MoEF**) issued Regulation No. 21 of 2022 re Procedures for Implementing Carbon Economic Value (**MoEF Regulation 21/2022**), being one of the ministerial regulations envisaged by PR 98/2021.

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MoEF Regulation 21/2022 provides much needed detail, which is lacking in PR 98/2021, on the use of Climate Change Mitigation efforts to implement NEK. More particularly, MoEF Regulation 21/2022 deals, at some length, with (i) domestic Carbon Trading and offshore Carbon Trading, (ii) performance based payments, (iii) charges on carbon, (iv) the mechanics of implementing other aspects of Indonesia's NDC, (v) measurement, reporting and verification of the implementation of NEK, (vi) organizing the national registry system for climate change control, (vii) Greenhouse Gas Emission reduction certification, (viii) management of funds for Carbon Trading, (ix) participation in the implementation of NEK and (x) monitoring and evaluation of the implementation of NEK.

PR 98/2021 and MoEF Regulation 21/2022 are **not** industry sector/subsector specific but, rather, set out the general regulatory framework applicable to Carbon Trading and other NEK implementation initiatives applicable to **all** industry sectors/subsectors.

Readers interested in knowing more about PR 98/2021 and MoEF Regulation 21/2022 are referred to the writer's earlier articles on these topics, being (i) "*Carbon Trading – Regulatory Framework Now Available*", December 2021 – January 2022 edition, Coal Asia Magazine, Petromindo and (ii) "*More Clarity on Carbon Trading Mechanics*", December 2022 – January 2023 edition, Coal Asia Magazine, Petromindo.

The Minister of Energy & Mineral Resources (**MoEMR**) has now issued Indonesia's **first** industry sector/subsector specific regulation on Carbon Trading, being MoEMR Regulation No. 16 of 2022, dated 27 December 2022, re Procedures for the Implementation of NEK in the Power Plant Subsector (**MoEMR Regulation 16/2022**).

On 26 January 2023, the Ministry of Energy & Mineral Resources (**ESDM**) prepared and circulated a very helpful explanation of the intended operation of MoEMR Regulation 16/2022 as part of Indonesia's ASEAN Indonesia 2023 energy transition initiative entitled "*ASEAN Matters: Epicentrum of Growth – Carbon Pricing in Power Generation Subsector*" (**ESDM Explanation of Carbon Pricing in Power Generation Subsector**).

## **ANALYSIS AND DISCUSSION**

### **1. Overview of MoEMR Regulation 16/2022**

MoEMR Regulation 16/2022 sets out how ESDM expects and requires that Carbon Trading will be used by parties owning or operating power plants to help reduce Greenhouse Gas Emissions in the power plant subsector of the Indonesian economy.

MoEMR Regulation 16/2022 applies/implements the general regulatory regime for Carbon Trading, as set out in PR 98/2021 and MoEF Regulation 21/2022, to/in the Indonesian power plant subsector.

MoEMR Regulation 16/2022 is to be properly seen as providing the next level of detail once Carbon Trading moves from being an economy wide general initiative to being an industry sector/subsector specific initiative.

While many of the Carbon Trading concepts used in MoEMR Regulation 16/2022 are taken from PR 98/2021 and MoEF Regulation 21/2022, MoEMR Regulation 16/2022 also introduces various new concepts that are power plant subsector specific.

## 2. Key Concepts

The most important concepts/definitions used in MoEMR Regulation 16/2022 are as follows:

- (a) **APPLE-Gatrik** – web-based app, administered by the Directorate General, that is used to calculate and report the level of GHG Emissions and GHG Mitigation Actions from/at power plants;
- (b) **Baseline GHG Emissions** – estimates of GHG Emissions in the power plant subsector during a particular period of time and without any Climate Change Mitigation or Climate Change Adaptation;
- (c) **Carbon Exchange** – Indonesia Stock Exchange, being the stock exchange or trading organizer which has obtained a business license from the Financial Services Authority for the conduct of Carbon Trading and/or the recording of ownership/transfers in the ownership of Carbon Units;
- (d) **Carbon Trading** – market-based mechanism to reduce GHG Emissions through either Emissions Trading or Emissions Offsetting;
- (e) **Carbon Units** – proof of carbon ownership in the form of SPE-GRKs/Other GHG Emissions Certificates recorded in the SRN PPI;
- (f) **Climate Change Mitigation** – control efforts to reduce GHG Emissions or increase GHG absorption to reduce the risk of climate change;
- (g) **Climate Change Mitigation Action** – action/activity that can help achieve Climate Change Mitigation;
- (h) **Climate Change Adaptation** – efforts to increase the ability to adapt to climate change;
- (i) **Climate Change Adaptation Action** – action/activity that can help achieve Climate Change Adaptation;
- (j) **Compliance Period** – period of time stipulated by the Minister for measuring the compliance or otherwise of Electricity Business Actors in reducing GHG Emissions in accordance with the applicable GHG Emissions Upper Limit;
- (k) **Cross-Sector Carbon Trading** – Carbon Trading between different sectors/subsectors;
- (l) **Direct Trade** – Carbon Trading conducted outside the Carbon Exchange between Electricity Business Actors which have GHG Emissions surpluses/excess Carbon Units and Electricity Business Actors which have GHG Emissions deficits/need Carbon Units;

- (m) **Director General** – director general with responsibility for drawing up and implementing policies in respect of the development, control and supervision of the electricity sector;
- (n) **Electricity Business Actor** – holder of electricity supply business license for public or private purposes issued by the Minister and which conduct business activities in the electricity sector;
- (o) **Emissions Trading** – buying and selling of surplus GHG Emissions; that is, unused PTBAE-PU by Direct Trade or through the Carbon Exchange;
- (p) **GHG** – gases contained in the atmosphere, both natural and anthropogenic, which absorb and re-emit infrared radiation;
- (q) **GHG Emissions** – the release, from power plant units, of GHG into the atmosphere in a certain area and during a certain period of time as a result of human activities and economic activities;
- (r) **GHG Emissions Intensity** – amount of GHG Emissions released into the atmosphere per unit of power plant activity;
- (s) **GHG Emissions Inventory** – collection of data and information on the level, status and trend of changes in GHG Emissions;
- (t) **GHG Emissions Monitoring Plan** – plan for managing/monitoring GHG Emissions prepared by Electricity Business Actors;
- (u) **GHG Emissions Offset** – approved/recognized deemed fulfilment of all or part of Target GHG Emissions, as evidenced by GHG Emissions Offset Statements, in respect of power plant business activities and during a particular period of time, on the basis of GHG Emissions reduction efforts carried out in respect of another activity/business whether in the power plant subsector or in a different sector/subsector;
- (v) **GHG Emissions Offset Statements** – statements provided to the Minister by Electricity Business Actors wanting to utilize the benefit of the GHG Emissions reduction efforts carried out in respect of different activities/businesses to the activities/businesses of the would-be utilizers and for the purpose of obtaining Ministerial approval/recognition of GHG Emissions Offsets;
- (w) **GHG Emissions Reports** – reports on power plant unit activity and operation prepared by Electricity Business Actors;
- (x) **GHG Emissions Upper Limit** – highest permitted GHG Emissions level for the power plant subsector;
- (y) **Gross Electricity Production** – all public and private electricity production without any allowance or deduction for electricity produced/consumed for non-public/private purposes;
- (z) **Minister** – MoEMR;

- (aa) **MRV** – activity of measuring, reporting and verifying, in accordance with established procedures and standards, Climate Change Mitigation activities/performance/results and Climate Change Adaptation activities/performance/results;
- (bb) **NDC** – Indonesia’s 2021 commitment to achieve NZE by 2060 at the latest and with an interim 2030 target of a reduction in Indonesia’s greenhouse gas emissions of between 29% (without international assistance) and 41% (with international assistance);
- (cc) **NEK** – carbon economic value being the value of each unit of GHG Emissions;
- (dd) **Net Electricity Production** – gross electricity production as reduced by electricity produced/consumed for non-public/private purposes but without taking into account transformer losses of electricity production;
- (ee) **NZE** - net zero GHG Emissions;
- (ff) **Other GHG Emissions Certificates** – certificates/statements evidencing GHG Emissions reduction activities/performance/results that are (i) issued other than pursuant to the Indonesian scheme for the issuance, by the Minister, of SPE-GRKs, (ii) declared to be equivalent to SPE-GRKs and (iii) recorded in the SRN PPI in the form of a registry number and/or code;
- (gg) **PLTUs** – steam power plants that use coal as an energy source;
- (hh) **PTBAE** - technical approval of GHG Emissions Upper Limit for power plants;
- (ii) **PTBAE-PU** - PTBAE for Electricity Business Actors and/or determination of GHG Emissions quotas covering a particular Compliance Period for each power plant unit of a particular type of power plant;
- (jj) **SPE-GRKs** – GHG Emissions Reduction Certificates, being certificates issued by the relevant Indonesian government authority, providing proof of GHG Emissions reduction activities/performance/results that have gone through MRV and that are recorded in the SRN PPI in the form of a registry number and/or code;
- (kk) **SRN PPI** – web-based national registry system for managing data, information and resources on/for Climate Change Adaptation, Climate Change Mitigation and NEK in Indonesia;
- (ll) **Target GHG Emissions** – target levels of reduced GHG Emissions, applicable to power plant business activities during a particular period of time, as a result of Climate Change Mitigation or Climate Change Adaptation;
- (mm) **Validation** – systematic and documented process conducted by an independent third party (i.e., a Validator) to ensure that the design of Climate Change Mitigation/Climate Change Adaptation activity implementation meets the specified requirements; and

- (nn) **Verification** – an activity conducted by an independent third party (**i.e.**, a Verifier) to ensure the accuracy and quality assurance of data and resources submitted for inclusion in the SRN PPI by the person in charge of a particular Climate Change Mitigation/ Climate Change Adaptation activity.

### **3. Main Provisions of MoEMR Regulation 16/2022**

#### **3.1 Requirements for NEK Implementation in Power Plant Subsector:** Implementing NEK in the power plant subsector involves some or all of the following steps depending upon the type of power plant:

- (a) determination of PTBAE;
- (b) preparation of GHG Emissions Monitoring Plan;
- (c) determination of PTBAE-PU;
- (d) Carbon Trading;
- (e) preparation and lodgement of GHG Emissions Reports; and
- (f) evaluation of the results of Carbon Trading and auction of PTBAE-PU (if necessary).

In the case of PLTUs and power plants utilizing other forms of fossil fuels, NEK implementation involves each of (a) to (f) above while, in the case of power plants utilizing new and renewable energy sources, Carbon Trading is to be carried out in the form of Emissions Offsetting (Article 2 of MoEMR Regulation 16/2022).

For the purposes of NEK implementation, all power plants must (i) operate efficiently and (ii) prioritize the use of Emissions Offsetting (Article 3 of MoEMR Regulation 16/2022).

The prioritization of Emissions Offsetting, rather than Emissions Trading, presumably reflects the reality that the opportunities for Emissions Trading are currently quite limited owing to the lack of available “surplus” GHG Emissions or unused PTBAE - PU.

#### **3.2 Determination of PTBAE for Power Plants:** PTBAE is to be determined for the power plant subsector based on:

- (a) Baseline GHG Emissions;
- (b) NDC targets for the power plant subsector;
- (c) results of GHG Emissions Inventory obtained from APPLE-Gatrik;
- (d) specified timeframe for achieving NDC targets for the power plant subsector;
- (e) the fact that the actual amount/value of GHG Emissions in the power plant subsector is currently below the GHG Emissions reduction target for the power plant subsector; and

- (f) the Carbon Trading “road map” for the power plant subsector (Article 4(1) and (2) of MoEMR Regulation 16/2022).

The use of PTBAE, in the power plant subsector, is to be implemented in three phases, being:

- (a) Phase 1: 2023-2024;
- (b) Phase II: 2025-2027; and
- (c) Phase III: 2028-2030.

There is to be a different PTBAE determined, by the Minister, for “*each type of power plant*” (Article 4(4) of MoEMR Regulation 16/2022). This, presumably, is a reference to (i) PLTUs, (ii) power plants using other types of fossil fuels and (iii) power plants using new and renewable energy power sources.

During Phase I, however, PTBAE will only be implemented in respect of PLTUs as follows:

- (a) for non-mine mouth PLTUs with installed capacity of 25 MW to < 100 MW, PTBAE will be set at 1.297 tons of CO<sub>2</sub>e per MWh;
- (b) for mine mouth PLTUs with installed capacity of ≥ 100 MW, PTBAE will be set at 1.089 tons of CO<sub>2</sub>e per MWh;
- (c) for non-mine mouth PLTUs with installed capacity of 100 MW to ≤ 400 MW, PTBAE will be set at 1.011 tons of CO<sub>2</sub>e per MWh; and
- (d) for non-mine mouth PLTUs with installed capacity of > 400MW, PTBAE will be set at 0.911 tons of CO<sub>2</sub>e per MWh (Article 6 of MoEMR Regulation 16/2022 and ESDM Explanation of Carbon Pricing in Power Generation Subsector).

**3.3 Preparation of GHG Emissions Monitoring Plan:** Before Electricity Business Actors may participate in Carbon Trading, they must prepare an **annual** GRK Emissions Monitoring Plan, for **each unit** in their power plants, which (i) consists of a Gross Electricity Production plan and (ii) takes into account GHG Emissions level targets for power plants based on activity data and utilizing calculation methodology consistent with the GHG Inventory Calculation & Reporting Guidelines issued by the Director General (Article 7 of MoEMR Regulation 16/2022).

The GHG Emissions Monitoring Plan is to be submitted to the Minister, through the Director General and via APPLE-Gartik, not later than 31 December of the current Compliance Period and applies to the immediately following Compliance Period (Article 8 of MoEMR Regulation 16/2022).

Failure to submit the GHG Emissions Monitoring Plan excludes the relevant Electricity Business Actor from participating in Carbon Trading during the immediately following Compliance Period (Article 9 of MoEMR Regulation 16/2022).

3.4 **Determination of PTBAE-PU for Power Plants:** PTBAE-PU for **each** power plant **unit** is determined and allocated by the Minister/Director General, not later than 31 January each year, on the basis of (i) PTBAE for the relevant type of power plant, (ii) average GHG Emissions Intensity data and (iii) average GHG Emissions data.

The aggregate value of PTBAE-PU, determined/allocated for all power plant units of a particular type, must not exceed the value of PTBAE determined for the relevant type of power plant (Article 10 of MoEMR Regulation 16/2022).

PTBAE-PU represents the GHG Emissions quotas given to Electricity Business Actors and which allow Electricity Business Actors to produce GHG Emissions during a particular Compliance Period expressed in tons of CO<sub>2e</sub>.

The ESDM Explanation of Carbon Pricing in Power Generation Subsector provides the following formula for the calculation of PTBAE-PU:

$$\text{PTBAE-PU (ton CO}_2\text{e)} = (\text{PTBAE (ton CO}_2\text{e/MWh)} \div \text{Previous Year Average GHG Emissions Intensity (ton CO}_2\text{e/MWh)}) \times \text{Previous Year Average GHG Emissions (ton CO}_2\text{e)}$$

For 2023, there is an automatic allocation of 100% of PTBAE-PU to each PLTU Electricity Business Actor in respect of the power plant units owned/operated by them (Article 12(1) of MoEMR Regulation 16/2022).

**After** 2023, PTBAE-PU is to be allocated to individual Electricity Business Actors in accordance with the results of their Carbon Trading during the previous Compliance Period. If individual Electricity Business Actors achieve (i) at least 85% of the intended Carbon Trading outcome/result, they will receive the corresponding % allocation of PTBAE-PU for the immediately following Compliance Period or (ii) less than 85% of the intended Carbon Trading outcome/result, they will receive a fixed 85% of PTBAE-PU for the immediately following Compliance Period (Article 12 of MoEMR Regulation 16/2022).

The ESDM Explanation of Carbon Pricing in Power Generation Subsector provides a summary of how PTBAE-PU is to be allocated to Electricity Business Actors that is somewhat different from that set out in Article 12 of MoEMR Regulation 16/2022. More particularly, the ESDM Explanation of Carbon Pricing in Power Generation Subsector indicates that, for 2024 and beyond, Electricity Business Actors which do **not** carry out Carbon Trading and/or do **not** submit the required GHG Emissions Reports, in respect of the previous Compliance Period, will receive a fixed 75% of PTBAE-PU for the immediately following Compliance Period.

3.5 **Carbon Trading:** Carbon Trading by Electricity Business Actors is to be carried out on a calendar year basis (**i.e.**, 1 January to 31 December). This is the relevant Compliance Period.

The results of Carbon Trading are assessed/calculated, for **each** power plant **unit**, as of the end of every Compliance Period and having regard to its performance in respect of (i) exceeding/not-exceeding PTBAE-PU and (ii) obtaining/not obtaining SPE-GRKs.

To the extent a particular power plant unit has a PTBAE-PU “surplus” at the end of the relevant Compliance Period (**i.e.**, its actual GHG Emissions are less than its quota of



permitted GHG Emissions for the relevant Compliance Period), (i) the relevant Electricity Business Actor may “trade” (**i.e.**, sell) its PTBAE-PU surplus during the immediately following Compliance Period and (ii) the PTBAE-PU surplus remains “valid” (**i.e.**, can be used by the buyer of the surplus for up to 2 years from the end of the Compliance Period in which the surplus was achieved).

A PTBAE-PU surplus cannot, however, be used by the relevant Electricity Business Actor for the purpose of obtaining SPE-GRKs (Article 13 of MoEMR Regulation 16/2022).

Electricity Business Actors may carry out Carbon Trading either domestically or, **to the extent allowed by the relevant laws and regulations**, offshore.

Both domestic Carbon Trading and offshore Carbon Trading, by Electricity Business Actors, may be in the form of either Direct Trade or trading via the Carbon Exchange (Article 14 of MoEMR Regulation 16/2022).

Carbon Trading, in the form of Emissions Offsetting, is **not** permitted between units of the same power plant (Article 15 of MoEMR Regulation 16/2022).

In the event that PTBAE (and, hence, PTBAE-PU) has not yet been determined for a particular energy related sector/subsector, relevant Electricity Business Actors may still carry out GHG Emissions Offsetting in reliance upon SPE-GRKs obtained with respect to activities carried out in these other energy sectors/subsectors. The relevant activities include (i) electricity generation activities utilizing new and renewable energy sources, (ii) transportation, building and industrial subsector activities promoting energy efficiency and (iii) other activities in the energy sector (Article 16 of MoEMR Regulation 16/2022).

For the purpose of Emissions Offsetting, Electricity Business Actors may use both SPE-GRKs and Other GHG Emissions Certificates (Article 17 of MoEMR Regulation 16/2022). This is in line with the mutual recognition scheme contemplated by Article 68 of MoEF 21/2022 and whereby Other GHG Emissions Certificates are deemed to be equivalent to SPE-GRKs.

Electricity Business Actors must submit a report, on the SPE-GRKs and/or Other GHG Emissions Certificates that they have acquired for the purpose of Emissions Offsetting, through APPLE-Gatrik and not later than five business days after the acquisition of such SPE-GRKs and/or Other GHG Emissions Certificates (Article 18 of MoEMR Regulation 16/2022).

Electricity Business Actors, which participate in Carbon Trading, must submit reports of their Carbon Trading activities. In the case of Direct Trading, the reports must be submitted (i) not later than 31 January of the immediately following Compliance Period and (ii) via Apple-Gartik (Article 19 of MoEMR Regulation 16/2022).

It is important to understand that Carbon Trading is intended to be compulsory for all Electricity Business Actors with actual GHG Emissions, from a particular power plant unit, that exceed the PTBAE-PU for that power plant unit in a particular Compliance Period. Electricity Business Actors, which do **not** comply with their Carbon Trading obligation in a particular Compliance Period, face the prospect of being subject to a penalty in the form of a reduced PTBAE-PU for the immediately following Compliance Period.

3.6 **Preparation and Submission of GHG Emissions Reports:** Electricity Business Actors, which participate in Carbon Trading, are required to prepare and submit GHG Emissions Reports (i) in respect of **each** power plant **unit**, (ii) not later than 31 January of the immediately following Compliance Period and (iii) via Apple-Gartik.

GHG Emissions Reports must include data on:

- (a) the “activity” of the relevant power plant unit during the relevant Compliance Period, including fuel consumption and fuel quality; and
- (b) the “operation” of the relevant power plant unit during the relevant Compliance Period, including (i) Gross Electricity Production, (ii) Net Electricity Production and (iii) other data related to performance.

The Minister/Director General will review all submitted GHG Emissions Reports in order to ensure the required activity data and operations data has been included.

Non-compliant GHG Emissions Reports must be revised and re-submitted by the relevant Electricity Business Actor.

GHG Emissions Reports, determined by the Minister/Director General to be compliant, must subsequently undergo Validation and Verification that is to be completed by not later than 31 March of the immediately following Compliance Period (Articles 21 to 26 of MoEMR Regulation 16/2022).

3.7 **Other Reporting Requirements:** Electricity Business Actors, which participate in Carbon Trading, must submit to the Director General and not later than 20 April of the immediately following Compliance Period, (i) results of their PTBAE-PU implementation, (ii) proof of their Emissions Offsetting implementation and (iii) their GHG Emissions Reports that have undergone Validation and Verification (Article 27 of MoEMR Regulation 16/2022).

3.8 **Evaluation of Carbon Trading and Possible Auction of PTBAE-PU:** The Minister/Director General will review the results of Carbon Trading by Electricity Business Actors.

Should the Minister/Director General determine that (i) Carbon Trading by Electricity Business Actors is not achieving its intended results and (ii) the unsatisfactory results of Carbon Trading are due to there being insufficient availability of PTBAE-PU, the Minister/Director General may conduct an auction of additional PTBAE-PU (Articles 30 and 31 of MoEMR Regulation 16/2022).

## **SUMMARY & CONCLUSIONS**

MoEMR Regulation 16/2022 provides much needed additional “nuts and bolts” detail of how ESDM intends to administer and implement Indonesia’s general regulatory framework for Carbon Trading in the power plant subsector.

As various aspects of MoEMR Regulation 16/2022 are far from clear, the ESDM Explanation of Carbon Pricing in Power Generation Subsector is an essential “aide memoir” in understanding what is ESDM’s current interpretation of MoEMR Regulation 16/2022.

NEK and Carbon Trading, in the power plant subsector, are specific to individual units of a particular power plant rather than just to that power plant as a whole.

Carbon Trading is compulsory, rather than merely optional, for all Electricity Business Actors with actual GHG Emissions, from a particular power plant unit, that exceed the PTBAE-PU for that power plant unit in a particular Compliance Period. This is the clearest possible indication of ESDM's "seriousness" in ensuring that Electricity Business Actors make real progress in managing their GHG Emissions and otherwise achieving their Target GHG Emissions.

ESDM's interpretation and implementation of MoEMR Regulation 16/2022 is likely to continue to evolve over time.

It should be expected that similar industry sector/subsector specific regulations on Carbon Trading will, in due course, be issued in respect of other Indonesian industry sectors/subsectors that are significant sources of GHG Emissions. MoEMR Regulation 16/2022 will probably be the de facto "model" on which these other, industry sector/subsector specific, Carbon Trading regulations are based. As such, understanding the intended operation of MoEMR Regulation 16/2022 is of considerable importance to business actors in all industry sectors/subsectors with a GHG Emissions problem.

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