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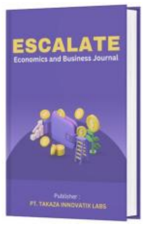

Strategic Communication Governance at PLN: Integrating Stakeholders, Public Information Disclosure, and Sustainability

(PLN Strategic Communication Governance: Stakeholder Integration, Information Transparency, and Sustainability)

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Abstract : *Energy state-owned enterprises operate at the intersection of commercial objectives, public-service obligations, government policy, and sustainability transitions. This study examines how PT PLN (Persero), Indonesia's state-owned electricity company, institutionalizes strategic communication governance by integrating stakeholder management, public information disclosure, and sustainability. A qualitative document analysis was conducted on four formal corporate instruments issued between 2024 and 2025: the strategic policy on corporate communication and social and environmental responsibility, the operational procedure for corporate communication, the procedure for public information management and services, and the decision establishing the Public Information List. The 2025-2034 Electricity Supply Business Plan was used as a contextual document. Directed qualitative content analysis applied six categories: strategic alignment and authority, stakeholder governance, disclosure and accountability, sustainability integration, issue and crisis communication, and monitoring and organizational learning. The findings reveal a highly formalized, multi-level governance architecture linking corporate headquarters, regional units, communication functions, social responsibility functions, and public information officers. The disclosure system is procedurally robust, with information classification, annual updating, consequence testing, digital documentation, request handling, objections, and dispute resolution. However, stakeholder engagement remains stronger in information and response modes than in sustained stakeholder involvement. Sustainability is integrated at the policy level, yet its operational connection to transition impacts, energy justice, and stakeholder influence on decisions remains limited. Monitoring is mandated, but outcome-oriented indicators of trust, inclusion, and decision influence are not specified. The study proposes an Integrated Strategic Communication Governance Model for Energy SOEs that connects mandate, stakeholder intelligence, engagement, disclosure, sustainability, crisis resilience, and learning.*

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Introduction

The transformation of the energy sector demands changes in technology, investment, regulation, consumption behavior, and the relationship between energy providers and the public. Therefore, the energy transition is not just a technical or financial issue, but also a communication and governance issue. Decisions regarding power plant development, transmission networks, electrification, renewable energy, electric vehicles, the phase-out of legacy technologies, and infrastructure financing have consequences that extend to customers, governments, investors, workers, local communities, the media, civil society organizations, and future generations. The quality of communication determines whether these changes are perceived as a shared agenda, an administrative obligation, a new risk, or a policy lacking social legitimacy.

Communication needs are more complex in state-owned enterprises (SOEs). Unlike purely private companies, SOEs must conduct business activities while simultaneously implementing public mandates and state policies. This dual role creates multiple expectations: corporate efficiency and performance, service quality, compliance, information disclosure, strategic information protection, social responsibility, and contribution to sustainable development. The OECD (2024) places transparency, accountability, integrity, stakeholder engagement, and sustainability as key elements of SOE governance. In this context, communication cannot be treated solely as a function of publication, media relations, or image management. Communication needs to be institutionalized as a system for decision-making, coordination, transparency, risk mitigation, and organizational learning.

PT PLN (Persero) is an important case study because the company plays a central role in national electricity supply and Indonesia's energy transition agenda. Its 2025-2034 Electricity Supply Business Plan (RUPTL) projects growth in electricity demand, the development of energy generation and storage, the expansion of transmission and distribution, and an increased mix of new and renewable energy. The scale of this agenda increases the number of stakeholders, the diversity of interests, and the potential for controversy, which must be managed through communication. The obligation to regularly report on the progress of the RUPTL also demonstrates that accountability is not merely a communication output, but part of the formal relationship between the company and the state (PT PLN [Persero], 2025c).

On the institutional side, PLN has issued several instruments that directly regulate communication and information disclosure. Board of Directors Regulation No. 0004.P/DIR/2024 integrates strategic corporate communication policies with Social and Environmental Responsibility (TJSL), Good Corporate Governance (GCG), and Environmental, Social, and Governance (ESG). This policy was then operationalized through Implementing Regulation No. 0048.E/DIR/2024 concerning Standard Procedures for Corporate Communication Management. In 2025, PLN issued Implementing Regulation No. 0005.SPo/DIR/2025 concerning Standard Procedures for Public Information Management and Services and Decree No. 0221.K/EVP KOM/2025 concerning Determination of the Public Information List. These documents collectively form a policy layer that enables research into communication as a governance architecture, not merely as a collection of publication activities.

Strategic communication studies have evolved from understanding communication as a tool for conveying messages to discussing the alignment of organizational goals, actors, processes, and resources. Hallahan et al. (2007) define strategic communication as the deliberate use of communication by an organization to fulfill its mission. Zerfass et al. (2018) expand attention to communication practices that are significant for the organization's continuity, legitimacy, and direction. However, strategic communication research in state-owned energy enterprises is often fragmented: some address reputation and crisis, some address CSR or sustainability, and others address information disclosure as a public administration issue. This fragmentation risks overlooking the relationship between corporate communication functions, stakeholder management, PPID (Regional Public Information System), and sustainability communication.

On the other hand, the literature on public engagement in energy transitions shows that providing information does not automatically result in fair participation or legitimate decisions. Suboticki et al.

(2023) emphasize that public engagement needs to be assessed through a justice perspective, including who is involved, when the engagement occurs, and how much influence it has on the transition process. Goes et al. (2026) also show that engagement strategies often lack a clear theoretical basis, causal mechanisms, target audience, and contextual evaluation. These findings are relevant for assessing whether energy companies' communication governance only regulates information dissemination and reputational support, or also fosters meaningful engagement.

Public information disclosure adds another dimension. As a public body, PLN must provide information quickly, easily, accurately, transparently, and accountably, but at the same time, it must protect information that is exempted due to legal, security, competition, contractual, privacy, or service continuity considerations. The tension between transparency and information protection makes the PPID not merely an administrative unit, but rather part of strategic communication governance. Managing information requests, objections, disputes, updating the Public Information List, and testing consequences generates data and lessons learned that should be linked to communication agendas, issue management, and sustainability.

This research addresses this gap by positioning internal company regulations as a representation of communication governance design. The research does not measure implementation effectiveness, public perception, or actual levels of trust. The focus is on assessing how strategic communication is institutionalized, how the three subsystems—stakeholder management, public information disclosure, and sustainability—are connected, and what normative gaps remain. The research questions are formulated as follows: (1) how are the structure, authority, and processes of strategic communication governance established within PLN policies; (2) how are stakeholder management, public information disclosure, and sustainability integrated; (3) what strengths and gaps emerge when this architecture is compared with external theories and standards; and (4) what kind of integrative model can be formulated for state-owned energy companies.

Literature Review and Analysis Framework

Strategic Communication Governance

Strategic communication refers to the deliberate and coordinated use of communication to support an organization's mission (Hallahan et al., 2007). This definition shifts attention from communication products to the relationships between goals, decisions, actors, and processes. Zerfass et al. (2018) emphasize that the field of strategic communication encompasses all communication substantively related to the organization's survival and success. Thus, strategic communication governance can be understood as the formal and informal arrangements that determine who is authorized to plan, approve, communicate, evaluate, and use communication outcomes in decision-making.

The concept of governance adds dimensions of accountability and control. In state-owned enterprises, strategic communication must align not only with corporate strategy but also with public mandates, state ownership, legal requirements, and societal interests. The OECD (2024) emphasizes the need for clear roles, transparency, accountability, and responsibility of the board and management. Therefore, indicators of communication governance extend beyond the existence of a communications unit or publication plan. They also encompass clarity of authority, cross-unit coordination, approval procedures, issue escalation mechanisms, oversight, evaluation, and the relationship between information obtained and organizational decisions.

In this study, strategic communication governance is analyzed through four dimensions: alignment with corporate goals and public mandates; actor and authority architecture; standardization of processes from planning to evaluation; and learning capacity. The last dimension is crucial because strategic communication should not stop at delivering messages but should generate new knowledge regarding the risks, perceptions, information needs, and social consequences of organizational decisions.

Stakeholder Management and Engagement

Stakeholders are individuals or groups that influence or are influenced by an organization's activities. Freeman (1984) places stakeholders at the center of strategic management, while Mitchell et al. (1997) explain stakeholder salience through the attributes of power, legitimacy, and urgency. The

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salience framework is useful for assessing whether an organization simply lists stakeholders or has a transparent basis for determining the priorities, intensity, and form of engagement.

Morsing and Schultz (2006) distinguish three stakeholder communication strategies. First, the stakeholder information strategy, which focuses on one-way information delivery. Second, the stakeholder response strategy, which provides feedback mechanisms but maintains primary organizational control over communication decisions. Third, the stakeholder involvement strategy, which positions communication as an ongoing, two-way process and enables stakeholders to contribute to organizational understanding and decisions. GRI 2-29 reinforces the need for meaningful engagement by requiring clarification of stakeholder categories, the identification process, the purpose of engagement, and how the organization ensures two-way, responsive, and ongoing communication, as far as possible, before decisions are made (GRI, 2021).

In the energy transition, engagement has a justice dimension. Suboticki et al. (2023) caution that more forums do not necessarily mean more justice if affected groups do not have equal access, capacity, or influence. Therefore, this study assesses not only the existence of communication channels, but also the orientation of engagement, representation of affected and vulnerable groups, timing of engagement, and the relationship between feedback and decisions.

Public Information Transparency, Accountability, and Legitimacy

Information transparency is an accountability infrastructure because it enables the public to understand the mandate, performance, resource utilization, risks, and basis for public agency decisions. Law No. 14 of 2008 and Information Commission Regulation No. 1 of 2021 distinguish between information that must be periodically announced, immediately announced, available at all times, and information that is exempt. The system requires responsible actors, classification, documentation, service times, complaint mechanisms, and dispute resolution.

For state-owned enterprises (SOEs), transparency presents particular complexities. Companies must fulfill the public's right to information while also maintaining legitimate confidentiality, including commercial, contractual, and personal information, as well as information that could disrupt services. Therefore, governance quality cannot be judged solely on the quantity of information disclosed. Assessments should include the quality of consequence testing, consistency of classification, ease of access, understandability, timeliness, documentation, and the organization's ability to transform requests or complaints into system improvements.

Transparency is also related to legitimacy. Suchman (1995) defines legitimacy as the perception that an organization's actions conform to social norms, values, and beliefs. Transparency can strengthen legitimacy if information is relevant, reliable, and allows for oversight. Conversely, merely formal transparency—for example, where documents are available but difficult to find, difficult to understand, or do not address stakeholder needs—can result in administrative compliance without substantive legitimacy.

Sustainability Communication and Energy Transition

Sustainability communication is not synonymous with promoting social activities or reporting positive achievements. It encompasses the process of explaining an organization's impacts, risks, dilemmas, targets, progress, limitations, and responsibilities, and fostering dialogue about how these impacts are managed. GRI 2 and GRI 3 place governance, policies, material topics, and stakeholder engagement as interrelated elements. The OECD (2024) also expanded its SOE guidelines with a dedicated chapter on sustainability.

In the energy sector, sustainability communications need to connect corporate agendas with impacts experienced by different groups. Energy infrastructure can generate national benefits as well as local costs, job changes, environmental risks, or inequities in access. Therefore, energy transition communications need to move from technology narratives to explanations of impacts and equity mechanisms. Goes et al. (2026) emphasize the need for clear objectives, theoretical foundations, causal mechanisms, target audiences, empirical validation, and contextual evaluation in engagement strategies. This framework is used to assess PLN's regulatory readiness to support evaluable transition communications.

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Analysis Framework

Based on the literature, the study uses six analytical categories that combine strategic, relational, accountability, and sustainability dimensions. These categories are not intended as a quantitative scale, but rather as a lens for examining patterns, relationships, and gaps between documents.

Category	Analytical Questions	Main References
Strategic alignment and authority	Are communication objectives aligned with corporate and public mandates? Who has the authority to plan, approve, implement, and evaluate?	Hallahan et al. (2007); Zerfass et al. (2018); OECD (2024)
Stakeholder governance	How are stakeholders identified, prioritized, segmented, engaged, and given space to influence decisions?	Freeman (1984); Mitchell et al. (1997); Morsing & Schultz (2006); GRI (2021)
Transparency and accountability	How is information classified, documented, announced, requested, excluded, questioned, and evaluated?	Law 14/2008; PerKI 1/2021; OECD (2024)
Sustainability integration	Is communication connected to impact, materiality, ESG/TJSL targets, affected groups, and the energy transition?	GRI (2021); OECD (2024); Suboticki et al. (2023)
Issue and crisis management	Does the system include risk identification, response, information consistency, public interaction, confidence restoration, and learning?	Coombs (2015); PLN corporate communication regulations
Monitoring and learning	What is measured, who evaluates, and do feedback, requests for information, and disputes influence subsequent policies?	Zerfass et al. (2018); Goes et al. (2026)

Research methods

This research uses a qualitative approach using the qualitative document analysis method. Document analysis was chosen because the research object is governance design as outlined in formal policies. Bowen (2009) explains that document analysis allows researchers to systematically examine the context, structure, language, priorities, and policy changes. This method is appropriate for answering questions about how organizations institutionalize communication, not for measuring perceptions or the impact of implementation.

The main corpus consists of four documents. First, PT PLN (Persero) Board of Directors Regulation Number 0004.P/DIR/2024 concerning Strategic Corporate Communication and TJSL Policies. Second, Implementing Regulation Number 0048.E/DIR/2024 concerning Standard Procedures for Corporate Communication Management. Third, Implementing Regulation Number 0005.SPo/DIR/2025 concerning Standard Procedures for Public Information Management and Services. Fourth, Decree of the EVP of Corporate Communication and TJSL Number 0221.K/EVP KOM/2025 concerning Determination of the Public Information List. PLN's 2025-2034 RUPTL is used as a contextual document to explain the scale of the energy mandate and the need for sustainability communication, not as the primary unit of coding.

The units of analysis were articles, paragraphs, points, definitions, division of authority, procedures, approval mechanisms, communication channels, information categories, and monitoring-evaluation provisions. The analysis used directed qualitative content analysis (Hsieh & Shannon, 2005). Six initial categories were derived from the theoretical framework in Table 1. In the first stage, all documents were read to identify the structure, objectives, and relationships between instruments. The second stage conducted deductive coding of provisions that fit the initial categories. The third stage recorded themes emerging from the documents, particularly the centralization-decentralization of

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authority, the relationship between reputation and openness, and information protection. The fourth stage compared the vertical consistency between strategic policies, operational procedures, and implementing decisions. The fifth stage compared the design with the OECD Guidelines for SOEs 2024, GRI 2: General Disclosures 2021, and PerKI 1/2021.

The credibility of the analysis was maintained through cross-level document triangulation, the search for evidence that supports and limits interpretations, and the construction of an audit matrix. Document authenticity was established based on number, date, issuing authority, formal structure, and referential relationships between documents. The study explicitly distinguished between normative provisions and actual implementation. Statements such as "PLN regulates," "documents require," or "policy architecture indicates" were used for document findings; the study did not claim that practices were effective without field data.

The study does not display screenshots or access metadata from internal systems. Direct quotations are minimized, and document content is paraphrased to maintain information security and avoid disclosing the identities of users. Before articles are submitted to journals, authors must ensure the classification and permission for use of internal documents. The main methodological limitation is the absence of interviews, observations, information request data, trust surveys, or evaluations of communication programs. Therefore, the results reflect the readiness and coherence of normative governance, not the effectiveness of implementation.

Code	Document	Year	Functions in Analysis
D1	Corporate Communication and TJSL Strategic Policy No. 0004.P/DIR/2024	2024	Strategic policy layers, principles, objectives, organization, GCG-ESG-TJSL integration
D2	Corporate Communication Management Standard Procedure No. 0048.E/DIR/2024	2024	Operational layers: planning, messages, channels, stakeholders, crisis, evaluation
D3	Standard Procedure for Public Information Management and Services No. 0005.SPo/DIR/2025	2025	Public accountability layers: PPID, DIP, classification, services, objections and disputes
D4	Decree on Determination of Public Information List No. 0221.K/EVP KOM/2025	2025	Implementation and formalization layers of DIP
D5	PLN's 2025-2034 RUPTL	2025	The context of energy mandates, transition, infrastructure development, and reporting accountability

Results and Discussion

Multi-Level Policy Architecture and Distribution of Authority

The first finding is the formation of a three-layer policy architecture. D1 establishes principles, objectives, actors, and strategic scope. Corporate communications are directed at building a positive image, mutual understanding, trust, acceptance, stakeholder support, and transparency within the GCG framework. At the same time, TJSL is positioned within the ESG framework with principles of integration, direction, measurable impact, and accountability. D2 translates these principles into operational procedures, while D3 and D4 develop specific subsystems for public information disclosure.

D2 demonstrates a high level of formalization. The communication cycle consists of planning, management, crisis communication, and monitoring and evaluation. Planning requires situational analysis using data and facts, methods such as PESTEL or SWOT, SMART objectives, target identification, and the appropriateness of messages, channels, materials, and schedules. A communication strategy includes, at a minimum, background, objectives, targets, key narratives, taglines, key messages, agenda setting, and a combination of paid, earned, shared, and owned media. These provisions demonstrate that communication is positioned as a managerial process that can be planned and measured.

The distribution of authority includes the Board of Directors, the managing director, the company secretariat, the corporate communications and TJSL functions, the head office work units, the Parent Unit/Centers, the Implementation Unit, and the Service Unit. The Parent Unit translates policies, manages social and mass media, produces materials, supervises the Implementation Unit, and monitors effectiveness. The Implementation Unit executes strategies at the operational level and oversees the

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Service Unit. This structure creates vertical accountability and allows for consistent messaging across a large organization.

However, this architecture also demonstrates a separation of subsystems. The corporate communications, TJSL, and PPID functions fall under a separate policy umbrella, but the document does not explicitly define a single forum or joint decision-making cycle that integrates stakeholder data, the sustainability agenda, information requests, complaints, and issue analysis. In other words, strong integration at the nomenclature and authority levels does not automatically translate into integration at the intelligence and decision-making levels.

Stakeholder Management Orientation

D2 broadly defines stakeholders as parties who have an interest in, influence, or can influence and be influenced by a company. External communications include customers, key opinion leaders, observers, academics, students, communities, investors, partners, sector actors, authorities, and the media. Communication targets can be determined based on demographic, psychographic, and behavioral characteristics. This demonstrates a fundamental capacity for audience segmentation, rather than approaching the public as a homogeneous group.

The stakeholder briefing mechanism is the most explicit form. Briefings are used to explain objectives, progress, constraints, follow-up plans, and timelines. The document also states the objectives of obtaining feedback and support and preventing misleading information. Within the framework of Morsing and Schultz (2006), this design combines a stakeholder information strategy with a stakeholder response strategy. The organization provides structured information while simultaneously opening up responses, but the primary goal remains to support policy and manage information uncertainty.

Two-way elements are also evident in internal and post-crisis communications, such as question-and-answer sessions, discussion forums, feedback forms, press conferences, and media coordination. However, the document does not specify the conditions under which feedback should change policies, narratives, program designs, or investment decisions. There are no explicit procedures for recording, categorizing, assessing, and acting on feedback based on its impact on stakeholders. Therefore, the stakeholder involvement strategy is only partially emerging.

Another gap is the absence of explicit salience criteria. The regulation recognizes interests and influence, but does not establish a prioritization method based on power, legitimacy, urgency, level of impact, vulnerability, or rights. Groups such as project-affected communities, workers experiencing skill changes, low-income customers, communities in remote areas, and vulnerable groups are not identified as specific categories. In the context of the energy transition, this lack of clarity can lead to engagement being more easily directed toward influential actors in the media rather than the most affected groups.

Thus, PLN's stakeholder governance strengths lie in its actor coverage, segmentation, channel diversity, and recognition of feedback. Its weaknesses lie in its impact-based and equity-based prioritization mechanisms, pre-decision engagement, and tracking the influence of input on decisions.

Strategy	Regulatory Evidence	Evaluation
Information	Key messages, agenda setting, media relations, social media, press releases, stakeholder briefings, periodic/immediate information.	Very powerful and standardized.
Response	Q&A sessions, discussion forums, feedback forms, media/social monitoring, information requests, objections.	Quite powerful, but mainly for clarification, support, and message adjustment.
Involvement	Dialogue and coordination are mentioned; TJSL requires relationships with stakeholders; there is no procedure for influencing input on decisions.	It is still partial and has not been institutionalized as co-decision or co-design.

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Information Disclosure as an Accountability Subsystem

D3 establishes a detailed information service architecture. Actors include the director who manages public information, the company secretariat function, the information service work unit, the Main PPID Supervisor, the Main PPID, the Implementing PPID Superior, the Implementing PPID, the Deliberation Team, and the information owner. The Main PPID coordinates policies, provides and announces information, receives requests, conducts consequence testing, socializes policies, prepares annual reports, and coordinates with other public bodies. The Implementing PPID performs similar functions at the Parent Unit/Centers.

The document distinguishes between periodic, immediate, and readily available information and exempt information. Periodic information includes the entity's identity, management structure, annual reports, financial statements, TJSL reports, audits, remuneration, governance, and government assignment activities. Immediate information includes electricity disruptions due to natural, non-natural, and social disasters, as well as public utility disruption plans. Available information includes the DIP, regulations and policies, organization and personnel, agreements, inventories, strategic plans, and information declared open through objections or disputes.

The DIP is determined through a cross-work unit inventory. The inventory list includes at least a summary, the owner unit, the person responsible for issuance, the time and place of creation, the format, and retention. The draft is discussed with the Deliberation Team and the information owner, approved by the Main PPID's superior, determined by the Main PPID, socialized, and updated at least annually. The D4 then operationalizes this obligation through a decision to determine the DIP in 2025.

Consequence testing can be conducted before a request, upon request, or during the dispute process. The process involves the PPID (Information and Communications Supervisory Agency), the Deliberation Team, and the information-holding unit, and is outlined in a written document that receives tiered approval. Open information is documented digitally and systematically, while exempt information must be protected. If a document contains both open and closed sections, redaction or summary mechanisms are used. This design demonstrates an effort to balance the right to know with the protection of legitimate interests.

Requests can be served online or offline. Written notification is given within ten business days and can be extended by seven days with written reasons. The mechanism includes acceptance or rejection, the basis for rejection, information format, costs, and a transfer to the authorized PPID (Regional Information Information Agency). Objections can be filed regarding rejection, the absence of regular information, the absence of a response, an inappropriate response, or failure to fulfill the request. If the objection is not resolved, the document regulates the dispute process through the Information Commission and/or the courts.

Procedurally, this subsystem is a key strength. Transparency is not treated as voluntary publication, but rather as a public right with time limits, responsibilities, and correction mechanisms. However, regulations focus more on availability and procedural compliance than usability. There are no detailed standards for plain language, readability, disability-friendly formats, information retrieval, interoperability, or measuring public understanding of information. Furthermore, data on requests, rejections, objections, and disputes are not yet required as formal input into corporate communication strategies and the determination of material sustainability issues.

Element	Design in PLN Regulation	Strengthening Potential
Classification	Periodic, immediate, at any time, and excluded.	Add guidelines for understandability, accessibility, and open data formats.
DIP	Cross-unit inventory, tiered approvals, minimum annual updates.	Use user needs analysis and request patterns for updates.
Consequence testing	Can be done before/when request/when dispute; involving PPID and owner unit.	Publish general methodology and understandable rationale without disclosing confidential information.
Service	Online/offline, deadline, editorial, fees, transfer of authority.	Measure user experience, actual time, answer understandability, and first completion.

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Element	Design in PLN Regulation	Strengthening Potential
Correct	Objections and disputes have formal procedures.	Integrate complaint/dispute trends into issue management and communication evaluation.

Sustainability Integration: Strong on Policy, Limited on Operational Dialogue

D1 explicitly integrates corporate communications with CSR, GCG, and ESG. CSR objectives include economic, social, environmental, legal, and governance benefits; value creation; community development; integration with the vision, mission, and strategic objectives; and stakeholder engagement. Communication principles include clarity, objectivity, accuracy, consistency, completeness, feedback, and sustainability. This integration provides an important normative foundation because it places sustainability communications under strategic policy, rather than as an additional activity.

However, D2 is more detailed in regulating reputation, brand, media, messaging, events, sponsorship, issues, and crises than in regulating sustainability impact communication. There are no specific procedures linking materiality assessment results, TJSL impact data, emission targets, RUPTL projects, community complaints, and communication narratives. The regulation also does not clearly separate sustainability communication that discloses performance from communication aimed at fostering participation in impact management.

This gap becomes crucial when placed in the context of the 2025-2034 RUPTL (Land Use Plan). The RUPTL includes large-scale energy generation and storage development, renewable energy expansion, transmission and distribution development, and renewable energy mix targets. This agenda has the potential to raise questions regarding location, financing, reliability, tariffs, land acquisition, environmental impacts, employment opportunities, and benefit distribution. Communication governance that only emphasizes key messages and publicity agendas is insufficient to ensure that issues of equity and trade-offs are communicated.

According to GRI 2-29, meaningful engagement needs to clarify who is involved, the purpose, how it is identified, the type and frequency of engagement, barriers to participation, and how results are centralized and used. The PLN document provides some of this foundation—specifically stakeholder categories, channels, and feedback—but does not yet require pre-decision engagement, address power imbalances, or report on how input informs decisions. Thus, sustainability integration is normatively more advanced than its deliberative counterpart.

Issue Management, Crisis, and Trust Restoration

D2 has a relatively comprehensive crisis management framework. The mitigation phase includes risk identification and analysis, developing a communications plan, rapid response, consistent, clear, factual, and transparent messaging, stakeholder and media engagement, media and social media monitoring, and a recovery narrative. The post-crisis phase emphasizes reputation and trust restoration, reporting on causes, impacts, and long-term solutions, stakeholder coordination, evaluation, and system improvement.

This arrangement indicates that trust is understood not only as a result of positive publicity, but also as a function of transparency, consistency, and the organization's ability to explain its actions. Internal communications also include question-and-answer forums, feedback forms, training, and documentation of lessons learned. This is a strong foundation for organizational resilience.

However, a dominant reputational orientation prevails. Media interactions are aimed, among other things, at controlling the narrative and avoiding misleading information. This orientation is justified in a crisis, but it needs to be balanced with the principles of accountability, acknowledgment of uncertainty, open correction, and space for legitimate criticism. Without indicators of the quality of dialogue, the success of a crisis can potentially be measured by the stability of reporting, rather than by restoring relationships and addressing the root causes.

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The relationship between crisis communication and immediate information within the PPID system has also not been formulated as a single, integrated protocol. D3 requires that certain power outage information be announced immediately, while D2 regulates message command and crisis channels. Strengthening this could be achieved through a single decision matrix that aligns crisis status, information categories, disclosure deadlines, spokespersons, channels, periodic updates, and correction responsibilities.

Monitoring, Evaluation, and Organizational Learning

D1, D2, and D3 require monitoring and evaluation. D2 even includes measurement at the input and process levels, as well as program alignment with planning. SMART objectives, data and fact analysis, media monitoring, and periodic evaluation demonstrate an evidence-based management orientation. D3 mandates information service work units to assess the success and effectiveness of public information management.

However, the document doesn't establish a unified outcome framework. Possible metrics—reach, publications, sentiment, number of requests, timeliness, reputation, trust, understanding, participation, or decision change—aren't defined in a unified way. As a result, each function may produce strong reports based on its own indicators, but the organization may not necessarily gain insight into the quality of relationships and legitimacy.

The most significant gap is the feedback-to-decision loop. Regulations address feedback collection, monitoring of conversations, information requests, objections, disputes, and evaluations, but do not explicitly mandate the consolidation of this data to: update stakeholder mapping; identify material issues; modify communication strategies; refine the DIP; adjust the TJSL program; or provide recommendations to project decision-makers. Thus, the system already has many sensors, but the mechanisms for converting information into strategic learning still need to be strengthened.

Discussion

From Communication Function to Governance Infrastructure

The research findings show that communication at PLN has moved beyond its publication function. Regulations govern mandates, actors, processes, approvals, resources, channels, crises, disclosures, corrections, and evaluations. Within Hallahan et al.'s (2007) framework, the design fulfills the purposeful use of communication element because communication objectives are linked to mission, reputation, stakeholder support, transparency, and sustainability. Within Zerfass et al.'s (2018) framework, communication is also linked to issues that determine the organization's legitimacy and sustainability.

The PLN case study's contribution lies in the integration of corporate communication functions with public agency obligations. Many corporate communication models are based on the organization's freedom to determine the information it wishes to convey. At PLN, this space is limited and enriched by the public's right to information, the Public Information and Transaction Reports (PPID), classification, service deadlines, complaints, and disputes. This means that strategic communication governance in state-owned enterprises cannot focus solely on optimizing organizational messages; it must encompass an accountability architecture that allows the public to request, verify, and challenge information.

However, institutional integration needs to be deepened from policy alignment to data integration. The communications function, TJSL, PPID, risk management, and business units collect different types of information. Without a shared system, organizations risk having numerous reports but little cross-functional learning. Mature governance requires cross-functional forums, a shared issue taxonomy, and escalation mechanisms that link public information to strategic decisions.

Formal Transparency and Substantive Transparency

The procedural authority of D3 is consistent with PerKI 1/2021. However, formal transparency does not always equate to substantive transparency. Availability refers to the existence of information, while accessibility and usability refer to the public's ability to find, access, understand, compare, and use information. In the technical energy sector, legal documents or lengthy reports may not necessarily address public needs.

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Therefore, the PPID system can be expanded into a public knowledge system. Strategic information needs to be provided at multiple levels of depth: plain-language summaries, structured data, source documents, questions and answers, and visual explanations. Repeated requests for information should signal that proactive information is inadequate. Objections and disputes are not only legal burdens, but indicators of a gap between organizational logic and public needs.

This approach also strengthens legitimacy. Suchman (1995) distinguishes between pragmatic, moral, and cognitive legitimacy. Quick and easy disclosure can serve pragmatic interests; explanations of impacts and considerations of fairness support moral legitimacy; while consistency and understandability help the public understand why an organization acts a certain way.

Towards Meaningful Engagement in the Energy Transition

Analysis by Morsing and Schultz (2006) shows that the PLN system is very strong on information, moderately strong on response, and not yet fully involved. This finding does not mean that every decision should be submitted to the public. Meaningful involvement means that the organization clarifies stakeholders' spheres of influence, invites relevant groups before final decisions, provides sufficient information, reduces barriers to participation, documents input, and explains how input is considered.

This need is increasingly important in the energy transition. Suboticki et al. (2023) demonstrate that engagement needs to be viewed through a lens of equity; processes that are open but only attended by high-powered actors can remain exclusive. Therefore, stakeholder mapping needs to combine salience with impact and vulnerability. Influential actors are not always the same as the most impacted groups. GRI 2-29 also encourages organizations to clarify the categories, objectives, methods, and quality of engagement.

For PLN, engagement can be tailored to the type of decision. One-way information is appropriate for urgent operational notifications. Response and consultation are appropriate for service improvements or program design. Deeper engagement is needed for projects with major socio-environmental implications, relocations, livelihood changes, workforce transitions, or needs-based CSR programs. Governance should determine the level of engagement based on impacts, decision reversibility, conflicts of interest, and the rights of affected groups.

Integrated Strategic Communication Governance Model for State-Owned Energy Enterprises

Based on the results, the study proposes an Integrated Strategic Communication Governance Model for Energy SOEs. This model does not replace existing structures but rather connects subsystems that are currently managed separately. The model consists of seven recurring components.

1. Mandate and Strategic Direction —State mandate, corporate strategy, GCG, ESG, RUPTL, public service obligations.
2. Governance Architecture —Board of Directors, Corporate Secretariat, Corporate Communications, TJSL, PPID, Risk, Legal, Main Unit-Implementation-Service.
3. Stakeholder Intelligence —Identification based on influence, legitimacy, urgency, level of impact, vulnerability, rights, and information needs.
4. Engagement Portfolio —Selection of information-response-involvement strategies according to the type of decision and impact.
5. Disclosure and Accountability Infrastructure —DIP, consequence testing, digital documentation, requests, objections, disputes and corrections.
6. Sustainability and Crisis Integration —Topics include materials, transition impacts, energy justice, TJSL, issue management, crisis, and recovery.

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7. Measurement, Assurance, and Learning —Indicators of compliance, understanding, trust, inclusion, quality of participation, influence of input, and policy change.

The model produces the desired outcomes of legitimacy, trust, informed participation, crisis resilience, accountability, and sustainability. These outcomes are not findings on PLN's effectiveness, but rather objectives that need to be tested through implementation research. The model's strength lies in its loop: data from engagement, PPID (Regional Information and Communications Agency), media, TJSL (Environmental and Social Security Agency), and the crisis feed back into stakeholder intelligence and strategic direction.

In practice, the model can be implemented through a Strategic Communication Governance Committee or equivalent coordination mechanism that does not require the creation of a new structure. This forum periodically consolidates issue maps, information requests, objections, sentiments, complaints, project risks, engagement results, and CSR reports. The results are summarized in recommendations to management, updates to the DIP, revisions to the communication strategy, and engagement agendas.

The gap	Governance Risk	Recommendation
Stakeholder data, PPID, TJSL, media, and risks are not yet required to be integrated.	Partial decisions and duplication of analysis.	Build cross-functional dashboards and forums with a shared issue taxonomy.
Stakeholder priorities are not yet based on impact and vulnerability.	Influential groups receive more attention than affected groups.	Use the power-legitimacy-urgency-impact-vulnerability-rights matrix.
Engagement is dominant information and response.	Involvement can be symbolic and belated.	Set engagement levels based on the materiality, impact, and reversibility of the decision.
Transparency focuses on procedures.	Information is available but difficult to use.	Add plain language standards, accessibility, structured data, and user experience.
Outcome indicators are not yet integrated.	Success is judged by communication output.	Measure understanding, trust, inclusion, quality of participation, and impact of input.
Sustainability communication has not been linked in detail to the impacts of the RUPTL.	Risk of greenwashing or legitimacy gap.	Connect material topics, project impacts, targets, trade-offs, and equity mechanisms with communication.

Conclusion

The study concluded that PT PLN (Persero) has established a relatively comprehensive regulatory foundation for strategic communication governance. This foundation takes the form of a tiered architecture linking corporate communication policies and TJSL, operational communication procedures, public information services, and DIP (Directive for Implementation of Public Information). Its key strengths are structural clarity, planning standardization, target segmentation, channel diversity, crisis management, information protection and transparency, service deadlines, complaint and dispute mechanisms, and monitoring and evaluation obligations.

The integration of stakeholder management, information disclosure, and sustainability has been demonstrated at the objective and institutional levels, but has not yet been fully integrated into a strategic learning cycle. Stakeholder management is more focused on information and response than involvement. The PPID system is procedurally robust but does not yet emphasize the understanding and use of information. Sustainability is integrated into policy, but operational communications do not explicitly link the impacts of the energy transition, equity, vulnerable groups, and stakeholder influence

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on decisions. Monitoring is mandatory, but relationship outcome indicators such as trust, inclusion, and input influence are not yet standardized.

The research's conceptual contribution is an Integrated Strategic Communication Governance Model for State-Owned Energy Enterprises. The model connects mandate and strategy, actor architecture, stakeholder intelligence, portfolio engagement, disclosure infrastructure, sustainability-crisis integration, and measurement and learning. The model can be used as a basis for communication governance audits and comparative research on other state-owned enterprises.

A limitation of this research is its reliance on normative documents. The study has not proven the alignment between regulations and practices, has not measured stakeholder perceptions, and has not analyzed data on PPID services or communication programs. Further research should include interviews with communication managers, PPIDs, the Social and Environmental Service Agency (TJSL), and operational units; analysis of information requests and complaints; engagement observations; and surveys of understanding and trust. Comparisons between headquarters and units are also important to assess the consistency of implementation in a decentralized organization.

Practical Implications

Establish a routine coordination mechanism across Corporate Communications, TJSL, PPID, Risk Management, Legal, and business units to consolidate stakeholder intelligence.

Establish a stakeholder matrix that incorporates influence, legitimacy, urgency, impact, vulnerability, and rights.

Develop an engagement ladder that determines when the organization is sufficient to inform, when to consult, and when to involve stakeholders in design or decisions.

Transforming data on information requests, objections, disputes, complaints, and media conversations into early indicators of information gaps and materials for updating DIP and communication strategies.

Develop integrated indicators that cover compliance, reach, understanding, trust, inclusion, quality of dialogue, impact of input, and policy learning.

Develop a tiered energy transition communications package: plain language summaries, structured data, explanations of impacts and trade-offs, technical documents, and a dialogue forum for affected groups.

Ethics Statement and Data Availability

The research uses organizational documents as data sources. This manuscript does not reproduce screenshots, watermarks, accessor identities, or content classified as restricted. The availability of documents to readers must comply with the classification and permission of PT PLN (Persero). Authors must obtain the necessary approvals before publication and provide only documents with public status or permitted citations.

Bibliography

Bowen, G. A. (2009). Document analysis as a qualitative research method. Qualitative Research Journal, 9(2), 27-40. https://doi.org/10.3316/QRJ0902027

Coombs, W. T. (2015). Ongoing crisis communication: Planning, managing, and responding (4th ed.). SAGE.

Freeman, R. E. (1984). Strategic management: A stakeholder approach. Pitman.

Global Reporting Initiative. (2021). GRI 2: General Disclosures 2021. GRI.

Goes, K., de Jong, B., Schlindwein, L. F., Klösters, M., Kraaijeveld, J., Kluiving, S. J., & Chappin, E. J. L. (2026). A framework to design and evaluate citizen engagement strategies to accelerate the energy transition. Heliyon, 12(9), e44975. https://doi.org/10.1016/j.heliyon.2026.e44975

Hallahan, K., Holtzhausen, D., van Ruler, B., Verčič, D., & Sriramesh, K. (2007). Defining strategic communication. International Journal of Strategic Communication, 1(1), 3-35. https://doi.org/10.1080/15531180701285244

Hsieh, H.-F., & Shannon, S. E. (2005). Three approaches to qualitative content analysis. Qualitative Health Research, 15(9), 1277-1288. https://doi.org/10.1177/1049732305276687

Komisi Informasi Republik Indonesia. (2021). Peraturan Komisi Informasi Republik Indonesia Nomor 1 Tahun 2021 tentang Standar Layanan Informasi Publik.

Mitchell, R. K., Agle, B. R., & Wood, D. J. (1997). Toward a theory of stakeholder identification and salience: Defining the principle of who and what really counts. Academy of Management Review, 22(4), 853-886. https://doi.org/10.5465/amr.1997.9711022105

Morsing, M., & Schultz, M. (2006). Corporate social responsibility communication: Stakeholder information, response and involvement strategies. Business Ethics: A European Review, 15(4), 323-338. https://doi.org/10.1111/j.1467-8608.2006.00460.x

OECD. (2024). OECD guidelines on corporate governance of state-owned enterprises 2024. OECD Publishing. https://doi.org/10.1787/18a24f43-en

PT PLN (Persero). (2024a). Peraturan Direksi PT PLN (Persero) Nomor 0004.P/DIR/2024 tentang Kebijakan Strategis Komunikasi Korporat dan Tanggung Jawab Sosial dan Lingkungan pada PT PLN (Persero).

PT PLN (Persero). (2024b). Peraturan Pelaksana PT PLN (Persero) Nomor 0048.E/DIR/2024 tentang Standar Prosedur Pengelolaan Komunikasi Korporat.

PT PLN (Persero). (2025a). Peraturan Pelaksana PT PLN (Persero) Nomor 0005.SPo/DIR/2025 tentang Standar Prosedur Pengelolaan dan Pelayanan Informasi Publik di Lingkungan PT PLN (Persero).

PT PLN (Persero). (2025b). Keputusan Executive Vice President Komunikasi Korporat dan TJSL PT PLN (Persero) Nomor 0221.K/EVP KOM/2025 tentang Penetapan Daftar Informasi Publik di Lingkungan PT PLN (Persero).

PT PLN (Persero). (2025c). Rencana Usaha Penyediaan Tenaga Listrik PT PLN (Persero) 2025-2034.

Republik Indonesia. (2008). Undang-Undang Republik Indonesia Nomor 14 Tahun 2008 tentang Keterbukaan Informasi Publik.

Republik Indonesia. (2010). Peraturan Pemerintah Republik Indonesia Nomor 61 Tahun 2010 tentang Pelaksanaan Undang-Undang Nomor 14 Tahun 2008 tentang Keterbukaan Informasi Publik.

Suboticki, I., Heidenreich, S., Ryghaug, M., & Skjølsvold, T. M. (2023). Fostering justice through engagement: A literature review of public engagement in energy transitions. Energy Research & Social Science, 99, 103053. https://doi.org/10.1016/j.erss.2023.103053

Suchman, M. C. (1995). Managing legitimacy: Strategic and institutional approaches. Academy of Management Review, 20(3), 571-610. https://doi.org/10.5465/amr.1995.9508080331

Zerfass, A., Verčič, D., Nothhaft, H., & Werder, K. P. (2018). Strategic communication: Defining the field and its contribution to research and practice. International Journal of Strategic Communication, 12(4), 487-505. https://doi.org/10.1080/1553118X.2018.1493485

https://doi.org/10.61536/escalate.v4i03.642