



Analysis of The Fiscal Reconciliation Treatment of PT NA in The Determination of Corporate Income Tax

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Abstract. The implementation of the self-assessment tax system in Indonesia is often hindered by regulatory complexity, which triggers compliance issues related to Corporate Income Tax. This phenomenon is highlighted in PT NA, a subsidized LPG distributor, which experienced significant divergence between commercial and fiscal financial statements due to subsidized and non-subsidized transactions. The main objective of this study is to analyze the causes of these differences and examine the implications of the fiscal reconciliation process on the calculation of payable Corporate Income Tax. A quantitative-qualitative case study was conducted at PT NA using the 2021 financial statements that had not been optimally reconciled. The analysis was carried out by comparing commercial Profit and Loss with tax regulations (Article 6 and 9 of the Taxation Law). The main results show the existence of Positive Fiscal Adjustments amounting to IDR 8,978,421,881 and Negative Fiscal Adjustments amounting to IDR 9,046,380,000. These adjustments changed the Taxable Income to IDR 870,136,000 and Underpaid Tax to IDR 133,314,700, indicating substantial adjustments from the initial report. It is concluded that fiscal reconciliation is highly crucial and significantly changes the amount of payable Corporate Income Tax. Inaccuracy in this process risks triggering disputes and fiscal sanctions. Practically, this study serves as an important reference for PT NA and similar entities to reconstruct accurate fiscal reports in order to ensure tax compliance.

Keywords: Accounting-Fiscal Differences, Corporate Income Tax, Fiscal Reconciliation, LPG, Subsidized LPG.

1. INTRODUCTION

Tax can be described as the backbone of a nation's finances, functioning as a vital instrument in supporting the sustainability of the economy and national development. Optimization of tax revenue collection is of essential significance in maintaining fiscal stability and the sustainability of a country's development. Failure to effectively achieve tax revenue targets will reduce the aggregate state revenue, thereby limiting the government's fiscal space to implement public investment policies. This directly impacts the funding of strategic initiatives in the education sector, healthcare services, and physical infrastructure (Doli Syahputra Hasibuan et al., 2025).

Table 1. Realization of State Revenue.

Revenue Source –	Realization of State Revenue (Billion Rupiah)				
	2020	2021	2022	2023	2024
Public Finance					
I. Domestic	1,628,950	2,006,334	2,630,147	2,634,149	2,801,862
Revenue					
1. Tax Revenue	1,285,136	1,547,841	2,034,553	2,118,348	2,309,859

a. Domestic Tax	1,248,415	1,474,145	1,943,655	2,045,450	2,234,959
b. International	36,721	73,695	90,897	72,898	74,900
Trade Tax					
2. Non-Tax	343,814	458,493	595,594	515,800	492,003
Revenue					
a. Natural Resource	97,225	149,489	268,770	223,312	207,669
Revenue					
b. Separated	66,080	30,496	40,597	81,535	85,845
State Property					
Revenues					
c. Other Non-Tax	111,200	152,504	196,324	131,493	115,136
Receipts					
d. Public Service	69,308	126,002	89,902	79,459	83,352
Agency Revenue					
II. Grants	18,832	5,013	5,696	3,100	430
Total	1,647,783	2,011,347	2,635,843	2,637,249	2,802,293

Source: Badan Pusat Statistik (BPS)

The contribution of tax to Indonesia's state treasury is considered very significant. This conclusion is drawn based on statistical analysis by BPS, covering historical data over the last five fiscal years displayed in Table 1. The figures in Table 1 clearly demonstrate Indonesia's high dependence on tax revenue, indicating substantial fiscal reliance.

In order to optimize tax revenue collection to maintain socioeconomic stability, the Direktorat Jenderal Pajak (DJP) continuously implements various strategies and innovations. These efforts encompass four main pillars: improving service quality, strengthening oversight, expanding the tax base, and enforcing law more effectively. The NIK has been established by DJP to serve double duty as NPWP, as part of the latest administrative reforms. In addition, the Coretax System has been implemented with the intention of simplifying the tax compliance process for Taxpayers.

The foundational philosophy of Indonesian taxation is the principle of self-assessment. This principle mandates the Taxpayer to independently conduct the calculation, payment, and reporting of taxes. On the other hand, the role of the government remains as a vital supervisory entity. This oversight function is intended to ensure that the authority granted is not misused, thereby maintaining the stability of the tax system and maximizing state revenue collection. Although the self-assessment system grants autonomy to Taxpayers, its implementation often

faces significant obstacles, one of which is the low understanding of complex taxation regulations among Taxpayers. This difficulty has the potential to impede compliance and overall system effectiveness. Therefore, a comprehensive understanding of taxation regulations becomes crucial so that Taxpayers can fulfill their obligations correctly and recognize the effect of tax compliance. Based on research (Rizki Hapsari et al., 2022), substantial comprehension by Taxpayers of essential elements in taxation namely taxpayer identification (NPWP), system model, normative regulations, administrative procedures, and the macroeconomic function of tax is positively correlated with their level of fiscal compliance.

Preparation of financial statements based on generally accepted accounting principles (i.e. SAK) is mandated for Taxpayers who maintain bookkeeping records. Referring to Article 1 of Undang-Undang Nomor 28 Tahun 2007, bookkeeping is defined as recording activities conducted regularly to aggregate financial information, from balance sheet and profit and loss components through acquisition values, culminating in issuance of annual financial statements.

PT NA is a limited liability company engaged as a distribution agent for 3-Kilogram Liquefied Petroleum Gas (LPG). The 3-Kilogram LPG plays a strategic role in Indonesia as a subsidized fuel to meet the basic needs of low-income households and micro-enterprises. Regardless of its essential role, this subsidy program faces a series of significant challenges. One of these challenges is the complex tax obligations for business entities such as PT NA, particularly in fulfilling Corporate Income Tax obligations. Although the distributed goods are subsidized items, the entity is still subject to Corporate Income Tax, especially on the nonsubsidized portion of the price or the margin surplus, additional income from subsidies, and transport fees, which leads to complexity in accounting and Corporate Income Tax calculation. Commercial accounting practices record all transactions without distinguishing the subsidized component from the non-subsidized one, differing from tax treatment. Based on this, fiscal treatment requires separation of subsidy and non-subsidy components which in turn triggers the need for a fiscal reconciliation for the purpose of calculating the amount of Corporate Income Tax payable.

Differences in regulation related to the Highest Retail Price (HET) of 3 kg LPG are identified as a source of this phenomenon. Under a specific regulation, namely Peraturan Gubernur Bali Nomor 10 Tahun 2018, the maximum retail price at the handover of goods (from agent to reseller) was set at IDR 13,550. The HET was later raised to IDR 16,000.00. The increase was ratified by Keputusan Gubernur Bali Nomor 866/01-C/HK/2022 and has been implemented since early 2023. The subsidy parameter determination refers to Peraturan Menteri ESDM Nomor 28 Tahun 2008. That provision mandates the retail selling price of 3-

kg LPG at the distribution agent point to be IDR 12,750. The discrepancy between the price regulated by the provincial government and the central government becomes the basis for deliveries that must be re-accounted to derive the Taxable Income.

The 3-kg LPG distribution system is already covered by various regulations, including Peraturan Presiden Nomor 104 Tahun 2007 (amended by Peraturan Presiden Nomor 70 Tahun 2021) and the Value Added Tax (VAT) regulations issued by the Minister of Finance. Nevertheless, the tax liability subject for this distribution remains a point of unresolved debate. Specifically, agents often express complaints regarding the imposition of Corporate Income Tax (PPh) and VAT on transportation fees or margin differences from the Highest Retail Price (HET). This indicates complexity and potential mismatch between existing regulation and operational reality in the field. Some Tax Service Offices (KPP) even apply different tax treatments, raising doubts among agents about fairness and legal certainty in tax collection. Tax consultants from Hiswana Migas have even recorded differences in perspectives concerning the imposition of Corporate Income Tax on the margin between selling price to reseller and the Retail Selling Price (HJE), and the VAT treatment on transportation fees (RRI.co.id, 2024). This demonstrates that interpretation and implementation in practice still vary. Agents may record transactions based on commercial accounting practices or different interpretations, while tax authorities use a different fiscal interpretation. This discrepancy increases the risk of errors in fiscal adjustments and may trigger tax disputes.

Inefficiency in the fiscal reconciliation process has the potential to create materially negative implications for Taxpayers and the state fiscal institution. For Taxpayers, such errors may lead to the risk of administrative fiscal sanctions, including fines, interest charges, or increased tax rates, which then add to financial burden through increased Corporate Income Tax payable. From the Government or Directorate General of Taxes (DJP) perspective, there is a loss if events, information or data reported are not complete and accurate according to applicable regulations this can result in suboptimal state revenue, and if tax disputes arise, it may burden the administrative resources within the Directorate General of Taxes (DJP). In addition, the importance of this study lies in determining and ensuring that fiscal adjustments are calculated in accordance with applicable regulations, as well as understanding the actual tax implications that occur.

Based on the above, this study is motivated to research this business field under the title “Analysis of Fiscal Reconciliation Treatment of Financial Statements of PT NA on the Amount of Corporate Income Tax.” This research will examine how differences in commercial

accounting and fiscal treatment through a process of fiscal reconciliation directly affect the calculation and amount of Corporate Income Tax payable by PT NA.

2. RESEARCH METHOD

This research was conducted at PT NA, a 3-kg LPG distribution company located in Buleleng, Bali. The selection of this location was based on the company's condition, which had not fully implemented fiscal reconciliation during the preparation of its 2021 Corporate Income Tax Annual Return (SPT PPh Badan) due to limited understanding of tax treatments. This situation caused the company to receive a warning letter from the Singaraja Tax Office (KPP Singaraja), while also providing the researcher with an opportunity to obtain relevant data access. PT NA is thus positioned as a representative case study to analyze fiscal reconciliation practices in the context of energy distribution companies. (References: Sugiyono, 2017; Law No. 36 of 2008 concerning Income Tax)

This research applied a mixed-method approach, consisting of both quantitative and qualitative data sourced from secondary and primary data. Quantitative data were obtained from the company's financial statements, which include the income statement, balance sheet, and asset depreciation data. Meanwhile, qualitative data were collected through semi-structured interviews with accounting staff and management to explore their understanding of financial reporting and tax treatments. Data collection techniques were carried out through documentation of company archives, including the Corporate Tax Annual Return and organizational structure, as well as interviews to strengthen information validity and depth. (References: Sugiyono, 2017; Sugiyono, 2018)

The data analysis in this research employed a descriptive quantitative approach with a comparative technique. The analysis process was carried out by comparing the company's commercial financial statements with the applicable taxation regulations to identify differences in accounting and fiscal treatments. The identified discrepancies were then processed through fiscal corrections and summarized in a fiscal reconciliation report as the basis for calculating Corporate Income Tax (PPh Badan) payable. This approach allows the researcher to present a systematic overview related to the gap between accounting standards and tax regulations. (References: Sugiyono, 2018; Mardiasmo, 2019)

3. RESULTS AND DISCUSSION

Description of the Research Object

1. Company profile

PT NA is a business entity established with the primary objective of becoming an Official Distribution Agent for subsidized 3-kilogram Liquefied Petroleum Gas (LPG) cylinders appointed by PT Pertamina (Persero). The establishment of this company is based on a commitment to support the government's program in ensuring energy availability for low income communities. The company's legality is strengthened by Deed of Establishment No. 4 dated 09 February 2009, drafted before a Notary Official. This Establishment Deed has been officially ratified by the Minister of Law and Human Rights of the Republic of Indonesia. With such complete legal authorization, PT NA operates as a legitimate and trusted entity in carrying out energy distribution activities.

The company is officially located in the eastern area of Buleleng Regency. This location was strategically selected to ensure logistical efficiency with easy access in distributing LPG to various distribution points within the assigned operational area. As an Official Agent of the 3 kilogram LPG, the company holds an appointment letter that designates it as an authorized partner of Pertamina. This appointment grants exclusive rights and obligations to PT NA to distribute subsidized LPG while complying with all operational safety standards and the Highest Retail Price (HET) determined by the authorities.

The core activities of PT NA include receiving quota allocations, temporary storage, and distributing 3-kilogram LPG cylinders from Pertamina Filling Stations to all official bases within its service area. The company prioritizes precise and targeted distribution, ensuring that the subsidized quota is delivered only to eligible communities. Supported by a well-managed vehicle fleet and distribution system, PT NA plays a vital role as the front-line supply chain in maintaining the stability of household energy availability while simultaneously serving as the official representative of Pertamina in fulfilling the community's energy needs in Buleleng Regency.

2. Company Structure

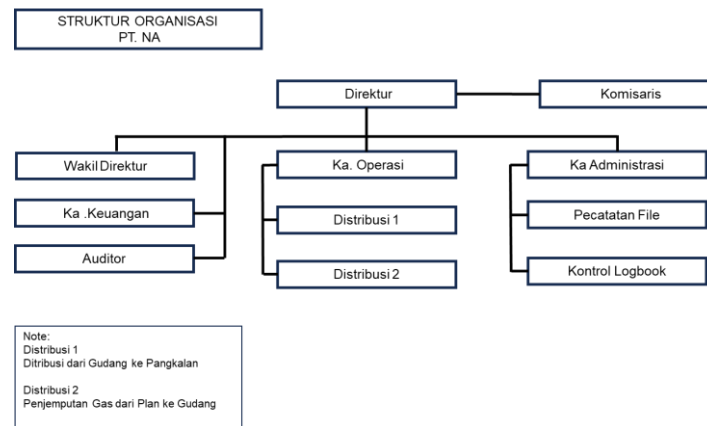


Figure 1. Organizational Structure of PT NA.

PT NA's organizational structure consists of three main functions that are responsible to the Director and/or Commissioner, namely:

1. Finance and Supervision Division

Financial management and reporting are under the responsibility of the Head of Finance, while the audit function and compliance examination of procedures and regulations are carried out by the auditor, all of whom are responsible to the Deputy Director.

2. Operational Division

The company's daily operational activities are coordinated by the Head of Operations, who oversees two main distribution functions, namely the activity of collecting gas (LPG) from the filling plant to the storage warehouse for processing and management (Distribution 2), as well as the task of delivering gas from the warehouse to each base or final distribution point (Distribution 1).

3. Administrative Division

Administrative management and document governance are handled by the Head of Administration, which includes supporting functions such as archiving activities and the management of all formal documents (file recording). Additionally, the supervision and maintenance of daily operational records (Logbook) are carried out to ensure data accountability.

Implementation of Fiscal Reconciliation in the Corporate Income Tax Annual Return

In the 2021 Fiscal Year, PT NA as a 3-kg LPG Agent had not fully implemented fiscal reconciliation in reporting its Corporate Income Tax Annual Return (SPT PPh Badan) with a normal status, resulting in errors in calculating tax payable and recognizing revenue. As a distributor of subsidized LPG, PT NA has dual tax obligations because its revenue is derived

from two types of income, namely final and non-final income. Final income includes the sale of 3-kg LPG that receives a government subsidy amounting to IDR12,750 per cylinder in accordance with the Minister of Energy and Mineral Resources Regulation (Permen ESDM) Number 28 of 2008. For this final income, Income Tax (PPh) withheld or paid is considered settled and cannot be credited in the Annual Tax Return. In addition, the acquisition, collection, and maintenance costs (3M expenses) related to final income cannot be treated as deductible expenses. In the LPG purchase transaction from producers or importers, PT NA is also subject to Final Income Tax under Article 22 amounting to 0.3% based on PMK Number 34/PMK.010/2017, which also cannot be credited in the tax calculation.

Meanwhile, non-final income includes the price margin of 3-kg LPG sales not covered by the government, the sales of 12-kg LPG, and transportation service income that is subject to Income Tax under Article 23 amounting to 2%. All of this income must be combined in the calculation of Taxable Income, and the related 3M expenses may become deductible expenses. However, some errors were identified, such as non-final income not being fully calculated, the tax credit of Article 23 Income Tax withheld by Pertamina not being utilized as a reduction of tax payable, and the full recognition of expenses without proportional allocation in accordance with Regulation ND-496/PJ.02/2024. This condition caused discrepancies in the reporting of the Corporate Income Tax Annual Return, particularly in calculating Taxable Income and Underpaid Tax.

Corporate Income Tax

In the filing of the 2021 Corporate Annual Income Tax Return with normal status, PT NA calculated its Corporate Income Tax using the provisions of Article 31E with the general tariff scheme, namely a basic rate of 22% with a tariff reduction facility of 50% for turnover up to IDR 4,8 billion, resulting in an effective rate of 11%, while the remaining turnover remains subject to the 22% rate. The Article 31E facility may only be used by Domestic Taxpayers whose gross circulation does not exceed IDR 50 billion in one fiscal year, as stipulated in Article 31E Paragraph 1 of Income Tax Law Number 7 of 2021, and PT NA meets all of these criteria. Based on the financial statement archive and the filing of the 2021 Corporate Annual Income Tax Return, the corporate income tax paid by PT NA with the application of the Article 31E facility was recorded at IDR 25.289.509 after undergoing the fiscal reconciliation process to determine the Taxable Income.

Table 2. Income Statement and Corporate Income Tax Calculation with Normal Status.

Income Statement & Tax Calculation	
For the period ended December 31, 2021	
Operating Revenue / Sales	10,384,711,033
Cost of goods sold	8,190,484,091
Operating Expenses	885,539,000
Total Net Profit Before Fiscal Adjustment	1,308,687,942
Non-Operating Income	0
Total Commercial Net Income	1,308,687,942
Final Income Not Subject to Tax	1,159,183,909
Positive Fiscal Adjustment	0
Total Fiscal Net Income	149,504,033
Taxable Income (TI)	149,504,000
Corporate Income Tax Calculation	
1. TI portion of gross circulation eligible for Article 31E facility.	
4,800,000,000	X Rp. 149,504,000 = 69,103,435
10,384,711,033	
Income Tax Payable = 69,103,435 X 11% =	7,601,378
2. TI portion not eligible for facility	
Taxable income	149,504,000
TI eligible for facility	69,103,435
Taxable income	80,400,565
Income Tax Payable = 80,400,565 X 22% =	17,688,124
Total Corporate Income Tax for 2021	25,289,502

(Source: PT NA)

In Table 2, the 2021 Corporate Income Tax calculation is not yet accurate, because the tax credit in the form of Article 23 Income Tax withholding for transportation services has not been counted as a deduction from the tax payable.

With the self-assessment system, the Government holds an important role in optimizing state revenue through supervision of Taxpayer reporting, whether in the form of Taxpayer Notices or Tax Audits. The purpose of this supervision is to encourage Taxpayers to voluntarily fulfill their tax obligations such as reporting, payment, or correction of the Tax Return (SPT) that is deemed inaccurate. This supervision is preventive and educative in nature.

Analysis of Fiscal Reconciliation on Financial Statements Toward the Amount of Corporate Income Tax

Taxpayers that maintain bookkeeping are required to prepare financial statements to determine the company's financial position and condition, as well as to fulfill the reporting of the Annual Corporate Income Tax Return (SPT). In the filing of the 2021 Normal Status Annual Corporate Income Tax Return, PT NA had not fully conducted fiscal reconciliation and there were inaccuracies in recording income, expenses, and tax calculations within the same fiscal period. These errors resulted in the issuance of a Notice urging the correction of the Annual Corporate Income Tax Return by the Singaraja Tax Office.

Based on the fiscal monitoring conducted, the tax authority issued a Request for Clarification on Data and/or Information (SP2DK) related to findings from the internal system of the Directorate General of Taxes (DGT) for the 2021 fiscal year. The document indicates several potential non-compliance issues as follows:

1. For taxpayers with mixed income (subject to final and non-final Corporate Income Tax), when there are inseparable costs (joint costs) affecting both types of income, the allocation of expenses in calculating Taxable Income must be conducted proportionally (prorated).
2. Based on the fiscal adjustments in the financial statements submitted by the taxpayer in the 2021 Annual Corporate Income Tax Return, there remains the potential for underpaid Income Tax Article 29.

Below is the commercial income statement of PT NA for the 2021 fiscal year after being reviewed regarding the recording of income and expenses, which serves as the basis for amending the Annual Corporate Income Tax Return.

Table 3. Adjusted Commercial Income Statement.

PT NA		
INCOME STATEMENT		
For the Period Ended December 31, 2021		
DESCRIPTION	COMMERCIAL (IDR)	NOTES
REVENUE		
Sales of Subsidized LPG	9,613,996,000	Sales of 3 Kg LPG
Sales of Non-Subsidized LPG	2,145,782	Sales of 12 Kg LPG
Transport Fee Revenue	753,680,929	
Total Revenue	10,369,822,711	

Cost of Revenue	
Cost of Goods Sold	8,597,216,695
Total Direct Service Cost	8,597,216,695
GROSS PROFIT	1,772,606,016
OPERATING EXPENSES	
Electricity & Water Costs	5,527,500
Telephone Expenses	3,902,000
Office Supplies Expenses	216,000
Transportation and Fuel Expenses	180,100,000
Religious Activity Expenses	4,401,000
Consumption Expenses	76,495,000
Plastic Wrap Installation Expenses	21,046,000
Security Fees & Donations	16,050,000
Tax Expenses	59,086,604
Miscellaneous Expenses	32,937,500
Depreciation Expenses	73,609,840
Building Maintenance Expenses	51,746,000
Vehicle Maintenance Expenses	93,393,910
Salary Expenses	216,000,000
TOTAL OPERATING EXPENSES	834,511,354
NET PROFIT BEFORE TAX	938,094,662

(Source: PT NA)

The adjusted commercial income statement of PT NA in Table 4.2 is prepared based on the applicable financial accounting standards. However, for taxation purposes specifically in calculating corporate income tax a fiscal reconciliation must first be performed in accordance with the relevant regulations to determine the taxable base. The following presents the fiscal reconciliation analysis along with its explanations:

1. Revenue

Table 4. Fiscal Adjustments on Revenue.

PT NA

FISCAL ADJUSTMENT REPORT

For the Period Ended December 31, 2021

DESCRIPTION	COMMERCIAL (IDR)	ADJUSTME N (+)	ADJUSM ENT (-)	FISCAL (IDR)
REVENUE				
Sales of 3-kg Subsidized LPG	9,613,996,000	0	9,046,380,000	567,616,000
Sales Revenue of 12-kg Non-Subsidized LPG	2,145,782	0	0	2,145,782
Transport Fee Rvenue	753,680,929	0	0	753,680,929
Total Revenue	10,369,822,711	0	9,046,380,000	1,323,442,711

Source: Processed by the author

1. Revenue from the sales of 3-kg LPG is negatively adjusted by IDR 9,046,380,000 in accordance with Minister of Energy and Mineral Resources Regulation (Permen ESDM) No. 28 of 2008, which states that the retail selling price determining the Highest Retail Price (HET) at the Agent delivery point (including VAT and Agent margin) of IDR 12,750 per cylinder is borne or subsidized by the Government. This means that such revenue is final in nature, and the tax withholding has been deemed completed by the Government; therefore, it cannot be reconsidered in taxable income.
2. The portion of 3-kg LPG revenue classified as Non-Subsidized, amounting to IDR 567,616,000, represents the excess amount not covered by the Government subsidy. This income is non-final and must be recalculated in determining income tax using the general tax rates under the Income Tax Law (UU PPh). The amount not subsidized by the Government is IDR 800 per cylinder, calculated from the Highest Retail Price in the Bali region (Bali Governor Regulation No. 10 of 2018) of IDR 13,550 minus IDR 12,750 (the subsidized amount).
3. Revenue from sales of 12-kg LPG represents the delivery of taxable goods that are not subsidized by the Government. The income amounting to IDR 2,145,782 must be included in determining taxable income.
4. Transport Service Revenue represents income from the transportation services of 3-kg LPG cylinders, which has been withheld by Pertamina at a rate of IDR 354.64 per kilogram and is subject to Income Tax Article 23 at 2%. This type of income is non-final

in nature, in accordance with PMK 141 of 2014, and must be recalculated in the determination of Taxable Income at year-end.

2. Cost of Revenue (HPP)

Table 5. Fiscal Adjustments on Cost of Revenue (HPP).

PT NA				
FISCAL ADJUSTMENT REPORT				
For the Period Ended December 31, 2021				
DESCRIPTION	COMMERCIAL (IDR)	ADJUSTMEN T (+)	ADJUSTMEN T (-)	FISCA L (IDR)
Cost of Revenue				
HPP	8,597,216,695	8,597,216,695	0	0
Total Direct Service	8,597,216,695	8,597,216,695	0	0
Cost				

Source: Processed by the author

The entire Cost of Goods Sold (HPP) is adjusted by IDR 8,597,216,695 based on PMK 34/PMK.010/2017, where purchases by Agents for deliveries made by Pertamina are classified as income subject to Income Tax Article 22. The tax is withheld directly by the producer (Pertamina) at the time of transaction at a rate of 0.3% and is final because PT NA acts as an official distributor or Agent of Pertamina. Therefore, HPP cannot be treated as deductible expenses in determining taxable income.

3. Operating Expenses

Referring to the Internal Memorandum of the Director of Tax Regulation I Number ND-469/PJ.02/2024 concerning the submission of the basis for proportional cost allocation, PT NA as an Agent that receives both final income and non-final income (income subject to general income tax rates) is required to allocate costs that relate directly to the 3M activities (obtaining, collecting, and maintaining income). These costs overlap between final and non-final income, and cannot be definitively separated based on actual operational conditions. Therefore, the allocation of deductible costs must be calculated proportionally based on the ratio between final and non-final income.

The amount of deductible expenses for determining taxable income is calculated using the following formula:

$$= \frac{\text{Penghasilan Tidak Final}}{\text{Jumlah Penghasilan Bruto (Final + Tidak Final)}} \times \text{Biaya Bersama}$$

Final income used in this calculation refers to the profit from final income, meaning the total sales of final-taxed LPG minus the cost of goods sold (COGS) that is also final. This approach reflects the principle of fairness, where the non-final taxable profit generated is larger than the portion of income classified as final (sales minus COGS).

Table 6. Calculation of Proportional Expense Allocation.

Proportional Expense Allocation	
Final Income Profit	$= \text{Final Income} - \text{Final COGS}$ $= 9,613,996,000 - 8,597,216,695$ $= 1,016,779,305$
Non-Final Income	$= \text{Non-Final Table 4 (Fiscal)}$ $= 567,616,000 + 2,145,782 + 753,680,929$ $= 1,323,442,711$
Total Gross Income	$= \text{Final} + \text{Non-Final}$ $= 1,016,779,305 + 1,323,442,711$ $= 2,340,222,016$
Charge Charges	$= \text{Non-Final Income}$ $\text{Gross Income (Final} + \text{Non-Final)}$ $= \frac{1,323,442,711}{2,340,222,016}$ $= 0.565520152$
Proportional Allocation Percentage	= 56.55%

Based on Table 6, the portion of expenses that may be used as a deduction in determining taxable income is 56.55% of the actual operational expenses reported in the commercial financial statements. The following section presents the fiscal adjustments for the company's operating expenses:

Table 7. Fiscal Adjustments for Operating Expenses.

PT NA				
FISCAL ADJUSTMENT REPORT				
For the Period Ended December 31, 2021				
DESCRIPTION	COMMERCIAL (IDR)	ADJUSTMENT (+)	ADJUSTMENT (-)	FISCAL

OPERATING EXPENSES

Electricity & Water Expenses	5,527,500	2,401,587	3,125,913
Telephone Expenses	3,902,000	1,695,340	2,206,660
Office Supplies Expenses	216,000	93,848	122,152
Transportation and Fuel Expenses	180,100,000	78,249,821	101,850,179
Religious Activities Expenses	4,401,000	1,912,146	2,488,854
Consumption Expenses	76,495,000	33,235,536	43,259,464
Plastic Wrap Installation Expenses	21,046,000	9,144,063	11,901,937
Security Fees & Donations	16,050,000	6,973,402	9,076,598
Tax Expenses	59,086,604	25,671,939	33,414,666
Miscellaneous expense	32,937,500	32,937,500	0
Depreciation Expense	73,609,840	31,981,992	41,627,848
Building Maintenance Expenses	51,746,000	22,482,594	29,263,406
Vehicle Maintenance Expenses	93,393,910	40,577,772	52,816,138
Salaries Expenses	216,000,000	93,847,647	122,152,353
TOTAL OPERATING EXPENSES	834,511,354	381,205,186	- 453,306,168

The Miscellaneous Expenses item in Table 7 above, amounting to IDR 32,937,500, represents entertainment expenses for which no nominative list is available. Referring to the technical regulation of the Directorate General of Taxes (SE-27/PJ.22/1986), the deduction of entertainment expenses is permitted as a reduction of gross income if the Taxpayer is able to

meet two main criteria: formal (administrative) and material (substantive) requirements; meaning that the expenditure is demonstrably related to 3M activities (to obtain, collect, and maintain income) (formal) and can be substantiated by preparing and attaching a nominative list in the Annual Tax Return (material).

Based on the discussion of the fiscal reconciliation analysis above, the overall summary of fiscal adjustments to the 2021 commercial income statement is presented in Table 8 below..

Table 8. Fiscal Adjustment Report (Amendment).

PT NA				
FISCAL ADJUSTMENT REPORT				
For the Period Ended December 31, 2021				
DESCRIPTION	COMMERCIAL	ADJUSTMENT (+)	ADJUSTMENT (-)	FISCAL
REVENUE				
Sales of Subsidized 3 Kg LPG	9,613,996,000	-	9,046,380,000	567,616,000
Sales Revenue of Non-Subsidized 12 Kg LPG	2,145,782	-	-	2,145,782
Transport Fee Revenue	753,680,929	-	-	753,680,929
Total Revenue	10,369,822,711	0	9,046,380,000	1,323,442,711
Cost of Revenue				
Cost of Goods Sold (COGS)	8,597,216,695	8,597,216,695		0
Total Direct Service Costs	8,597,216,695	8,597,216,695	0	0
GROSS PROFIT	1,772,606,016	8,597,216,695	9,046,380,000	1,323,442,711
OPERATING EXPENSES				
Electricity & Water Expenses	5,527,500	2,401,587		3,125,913
Telephone Expenses	3,902,000	1,695,340		2,206,660

Office Supplies	216,000	93,848		122,152
Expenses				
Transportation and Fuel Expenses	180,100,000	78,249,821		101,850,179
Religious Activities Expenses	4,401,000	1,912,146		2,488,854
Consumption Expenses	76,495,000	33,235,536		43,259,464
Plastic Wrap Installation Expenses	21,046,000	9,144,063		11,901,937
Security Fees & Donations	16,050,000	6,973,402		9,076,598
Tax Expenses	59,086,604	25,671,939		33,414,666
Miscellaneous Expenses	32,937,500	32,937,500		0
Depreciation Expense	73,609,840	31,981,992		41,627,848
Building Maintenance Expenses	51,746,000	22,482,594		29,263,406
Vehicle Maintenance Expenses	93,393,910	40,577,772		52,816,138
Salaries Expenses	216,000,000	93,847,647		122,152,353
TOTAL OPERATING EXPENSES	834,511,354	381,205,186	0	453,306,168
NET INCOME BEFORE TAX	938,094,662	8,978,421,881	9,046,380,000	870,136,543

Source: Processed by the author

Based on Table 8, the commercial income statement has been adjusted positively by IDR 8,978,421,881 and adjusted negatively by IDR 9,046,380,000. Based on these adjustments, the taxable income obtained is IDR 870,136,543. The amount of tax payable that must still be paid can be determined and calculated according to the general provisions of taxable income and reduced by tax credits already owned by PT NA. Table 9 below explains the technical calculation procedures..

Table 9. Corporate Income Tax (CIT) Calculation – Amendment.

PT NA	
TAX LIABILITY CALCULATION	
For the Period Ended December 31, 2021	
TAXABLE INCOME (TI)	870,136,000
CORPORATE INCOME TAX PAYABLE:	147.125.227
1. TI for Gross Revenue Eligible for Facilities	
4,800,000,000	x 870,136,000 = 402,769,933
10,369,822,711	
Corporate Income Tax = 402,769,933 X (22% X 50%) = 44,304,693	
2. TI for Gross Revenue Not Eligible for Facilities	
Taxable income	870,136,000
TI Eligible for Facilities	402,769,933
TI Not Eligible for Facilities	467,366,067
Corporate Income Tax = 467,366,067 X 22% = 102,820,535	
TOTAL CORPORATE INCOME TAX (CIT) PAYABLE	147.125.227
TAX CREDITS:	
PPh 23 Prepayment	13,810,527
Total Tax Credit :	13,810,527
INCOME TAX ARTICLE 29 FOR 2021	133,314,700

Source: Processed by the author

The Corporate Income Tax (CIT) payable for the 2021 Amendment in Table 9 amounts to IDR 133,314,700, which differs significantly from the underpayment tax amount reported in the Annual Corporate Income Tax Return (normal filing) of IDR 25,289,502 as presented in Table 4.1 above. The tax underpayment must be remitted to the State Treasury and reported in the Corporate Income Tax Return for the 2021 fiscal year.

Based on the analysis above, there are several factors that have the effect of causing the difference between the Annual Corporate Income Tax value under normal status and under amended status, namely internal and external factors. Lack of knowledge and the complexity of tax regulations led the finance division of PT NA to make errors in preparing the financial statements (internal factor), while the minimal frequency of socialization from related authorities, particularly regarding tax obligations for 3 Kg LPG Agents (external factor), increased the likelihood of such mistakes. This condition is strongly linked to attribution

theory, which explains how individuals interpret, decide, and act in performing certain responsibilities.

4. CONCLUSION

Based on the results of the analytical discussion regarding fiscal reconciliation, the following conclusions can be drawn:

1. The application of fiscal reconciliation in the 2021 Corporate Income Tax Return (normal status) has not fully implemented fiscal adjustments in accordance with Article 6 and Article 9 of the Income Tax Law (UU PPh) Number 7 of 2021, as well as the clarifying regulations regarding the proportional allocation of joint expenses for expenditures that cannot be distinctly separated in relation to 3M activities (acquiring, collecting, and maintaining), for income that is subject to final and non-final tax.
2. The calculation of tax payable in the Corporate Income Tax Return (normal status) is correct in applying the general tax rate and classifying PT NA as a qualifying taxpayer entitled to utilize the general rate facility under Article 31E of the Income Tax Law. However, there is an error in the calculation due to the failure to deduct the tax credit from the Income Tax Article 23 withholding imposed by Pertamina on Transport Service income.
3. The determination of taxable income based on commercial financial statements must be evaluated through fiscal reconciliation in accordance with the applicable regulations, particularly for companies engaged in the distribution of 3 Kg LPG cylinders, which receive both final and non-final income, as emphasized in the memorandum issued by the Director of Tax Regulations I Number ND-496/PJ.02/2024.
4. Based on the results of the research, after performing fiscal reconciliation in accordance with the prevailing regulations, it is identified that the positive fiscal adjustment amounts to IDR 8,978,421,881 and the negative fiscal adjustment amounts to IDR 9,046,380,000. These adjustments result in a taxable income of IDR 870,136,000 as the basis for taxation, and a tax underpayment of IDR 147,125,227. Considering there is a tax credit from Income Tax Article 23 amounting to IDR 13,810,527, this credit reduces the tax payable, leaving an outstanding tax balance of IDR 133,314,700.

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