



POTENTIAL LEGITIMACY CRISIS AND DEADLOCK OF LAW NUMBER 23 OF 2014 WITH CONSTITUTIONAL COURT DECISION NUMBER 135/PUU-XXII/2024 ON THE TERM OF OFFICE OF THE REGIONAL PEOPLE'S REPRESENTATIVE COUNCIL

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ABSTRACT

This study aims to analyze the constitutional implications of Constitutional Court Decision Number 135/PUU-XXII/2024 on the term of office of the Regional People's Representative Council (DPRD), democratic legitimacy, and the potential for constitutional deadlock in the Indonesian state system. The main focus of the study lies in the conflicting norms between the principle of a five-year period of power as stipulated in Article 22E of the 1945 Constitution of the Republic of Indonesia and the consequences of the separation of National Elections and Regional Elections which have the potential to extend the term of office of the DPRD without renewing the electoral mandate. This study uses a normative legal research method (normative juridical) with a conceptual approach, a statutory approach, and a case approach. Data were obtained through a literature study of primary legal materials in the form of the 1945 Constitution of the Republic of Indonesia, Law Number 23 of 2014 concerning Regional Government, and Constitutional Court Decision Number 135/PUU-XXII/2024, and secondary legal materials from related literature and scientific journals. The analysis was conducted qualitatively with systematic, grammatical, and teleological interpretation techniques. The research findings indicate that the separation of elections without a clear transitional design creates normative tension between the obligation to implement the Constitutional Court's final and binding rulings and the principles of periodicity of power and legal certainty. This situation has the potential to trigger a crisis of democratic legitimacy within the Regional People's Representative Council (DPRD) and create a constitutional deadlock in regional governance. The implications of this research emphasize the importance of formulating a comprehensive constitutional transition framework and legislative reconstruction to maintain the consistency of constitutional supremacy, the circulation of power, and the quality of local democracy in Indonesia.

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1. INTRODUCTION

The general election system is a key instrument in constitutional democracy because it functions as a mechanism for the circulation of power and establishes the political legitimacy of representative institutions (N.

H. Putri et al., 2023; Yunita & Maulia, 2024). In a democratic state governed by the rule of law, elections are not merely electoral procedures but rather a manifestation of popular sovereignty, which must be implemented periodically, regularly, and predictably (Suwarno et al., 2025; Taufiq & Suparno, 2026). Therefore, changes to election design must be examined from the perspective of constitutional law, legitimacy theory, and the principle of the periodization of power, not simply as technical policies. Changes to the electoral system have the potential to impact the stability of political institutions and the quality of democracy, particularly if they impact the term of office of representative institutions. In this context, Constitutional Court Decision No. 135/PUU-XXII/2024 is a crucial constitutional issue for academic analysis (Karo-Karo & Irwansyah, 2025).

Constitutional Court Decision No. 135/PUU-XXII/2024 established a separation between National and Regional Elections starting in 2029 with a two- to two-and-a-half-year interval, ending the practice of simultaneous elections since 2019 (Aisyah & Wulandari, 2025). This decision was based on considerations of implementation effectiveness, simplification of logistical and administrative burdens, and increased voter rationality (Fanandi & Sumarno, 2025). However, this separation has complex constitutional implications, particularly regarding the terms of office of Regional People's Representative Council (DPRD) members, which are structurally tied to the five-year election cycle. Consequently, the terms of DPRD members elected in the 2024 election could potentially be extended to 2031 or 2032, thus extending to seven to eight years and exceeding the constitutional principle of five years. This situation constitutes a new precedent in Indonesian constitutional history and raises serious constitutional issues regarding the consistency of the Constitutional Court's ruling with the principles of the periodization of power and democratic legitimacy. The legal implications of extending the DPRD's term of office indicate a potential structural and systemic crisis of democratic legitimacy (Rayhan et al., 2024). Article 22E of the 1945 Constitution of the Republic of Indonesia explicitly mandates that general elections be held every five years, including to elect DPRD members, thus implicitly limiting legislative terms to the same period (Ilhami, 2025). When DPRD members exercise their authority beyond this period without renewing their mandate through elections, political legitimacy derived from popular sovereignty becomes problematic. From the perspective of Max Weber's legitimacy theory, power based on legal-rational legitimacy will decline when the legal and democratic procedures that form the source of its authority are no longer periodically renewed (Hasanah, 2024).

This legitimacy crisis is further exacerbated when linked to positive legal provisions. Law Number 23 of 2014 concerning Regional Government explicitly stipulates that the term of office of DPRD members is five years, as stipulated in Article 102 paragraph (4) and Article 155 paragraph (4). This provision provides legal certainty regarding the end of the DPRD term when the DPRD members elected in the next election take their oath of office (Navisa, 2025). However, the implementation of the Constitutional Court's final and binding decision, as stipulated in Article 24C of the 1945 Constitution of the Republic of Indonesia, has the potential to conflict with these provisions. This conflict creates a constitutional deadlock, a situation of normative impasse in which the implementation of one constitutional norm has the potential to violate another.

This problem is further complicated because the Indonesian legal system does not provide a clear transition mechanism for the DPRD, as it does for filling the position of regional head through the appointment of an acting regional head. The Regional People's Representative Council (DPRD), as a collective institution, does not recognize the concept of acting DPRD members, thus positioning term extensions as the only alternative to maintain the continuity of legislative, budgeting, and oversight functions in the regions. However, this alternative raises serious legitimacy issues because the DPRD exercises strategic authority without a new democratic mandate from the people. This situation has the potential to weaken public trust in regional representative institutions and erode the foundations of constitutional democracy at the local level.

Several previous studies provide a relevant theoretical basis for understanding this issue. First, Ekayanta (2024) asserted that changes to election design that impact legislative term limits without additional legitimacy mechanisms have the potential to undermine public trust in representative institutions. Second, Agustino et al. (2022), in their study on democratic stability, demonstrated that term extensions of legislative institutions without re-elections are an early indicator of democratic backsliding, particularly in countries with developing electoral democracies. Third, Al Basith et al., (2025) emphasized that constitutional court decisions that have direct implications for the election cycle and the terms of office of political officials must be accompanied by a clear constitutional transition design to prevent a protracted crisis of legitimacy and normative conflict.

Although these studies make important contributions, studies specifically analyzing the implications of Constitutional Court decisions on the democratic legitimacy of the Regional People's Representative Council (DPRD) in the context of Indonesia's decentralized system are still very limited. Furthermore, no research has comprehensively examined the constitutional deadlock resulting from the conflict between the final and binding Constitutional Court decisions and constitutional provisions regarding election periodicity and DPRD terms of office. This lack of research indicates a significant research gap and underscores the urgency of this research.

Given the complexity of these issues, this study aims to comprehensively analyze the legal implications of Constitutional Court Decision No. 135/PUU-XXII/2024 on the democratic legitimacy of the DPRD, which has the potential to experience an extension of its term beyond the constitutional limit of five years. Furthermore, this research aims to identify and examine systemic forms of constitutional deadlock resulting from the normative conflict between the obligation to implement Constitutional Court decisions and the principle of a five-year election period. Ultimately, this research is expected to formulate constitutional, comprehensive, and implementable recommendations for resolution to safeguard the supremacy of the constitution, popular sovereignty, and the sustainability of democracy in Indonesia.

2. RESEARCH METHODS

This research employs a normative legal research method (normative juridical), which focuses on the study of legal norms as rules that regulate and legitimize the exercise of state power (Sari & Wiraguna, 2025; Seputra & Suyatno, 2024). This approach was chosen because the issues studied are directly related to conflicts between constitutional norms, the interpretation of statutory provisions, and the legal implications of Constitutional Court decisions within the Indonesian constitutional system. Therefore, this research positions law as a norm (law on the books) that is systematically analyzed to identify consistencies, conflicts, and legal gaps arising from changes to the general election design.

The approach used in this research encompasses several complementary approaches. First, a conceptual approach is used to examine and clarify relevant fundamental concepts, such as the rule of law, constitutional democracy, general elections, the legitimacy of power, the authority of the Constitutional Court, and the position and function of regional governments within the constitutional system. This approach aims to build a solid theoretical framework as a basis for normative analysis of the issues studied. Second, a statute approach is used to systematically and hierarchically examine relevant legal provisions, particularly Article 22E and Article 24C of the 1945 Constitution of the Republic of Indonesia, as well as Article 102 paragraph (4) and Article 155 paragraph (4) of Law Number 23 of 2014 concerning Regional Government. This approach is intended to identify any inconsistencies, contradictions, or potential conflicts of norms in the regulation of DPRD terms of office and the implementation of Constitutional Court decisions.

Furthermore, this study also employs a case approach to examine Constitutional Court Decision Number 135/PUU-XXII/2024 in depth. The analysis of this decision focuses on the legal considerations (*ratio decidendi*), the constitutional argumentation used by the Constitutional Court, and the normative implications of the decision for the general election system and DPRD member terms of office. This case approach is crucial for understanding how the Constitutional Court interprets constitutional norms and how the decision interacts with existing statutory provisions.

The data collection technique in this study was conducted through library research by collecting and reviewing relevant legal materials (Sumarna & Kadriah, 2023). The primary legal materials used included the 1945 Constitution of the Republic of Indonesia, Law Number 23 of 2014 concerning Regional Government, and Constitutional Court Decision Number 135/PUU-XXII/2024. Meanwhile, secondary legal materials were obtained from legal textbooks, national and international scientific journals, previous research results, and the opinions and doctrines of constitutional law experts relevant to the research topic. The collection of these legal materials was conducted systematically to ensure the completeness and relevance of the analyzed data.

Data analysis was conducted using a normative qualitative analysis method, namely by interpreting and constructing legal norms logically, systematically, and consistently (Sukmawan & Damayanti, 2025). The analysis stages included identifying relevant legal norms, examining hierarchical relationships between norms, and assessing the legal implications of any conflicting norms found. This analysis also utilizes legal interpretation techniques, such as systematic, grammatical, and teleological interpretation, to gain a comprehensive understanding of the meaning and purpose of the legal norms under study. The results of the analysis are then used to formulate conclusions and recommendations that are constitutional, argumentative, and academically justifiable.

3. RESULT AND ANALYSIS

Implications of the Constitutional Court Decision on the DPRD Term of Office

Constitutional Court Decision No. 135/PUU-XXII/2024, which separated National and Regional Elections starting in 2029, has fundamental constitutional consequences for the terms of office of members of the Regional People's Representative Council (DPRD) (Darmawan, 2025). This judicial policy not only changes the technical governance of election administration but also touches on essential dimensions of constitutional democracy, particularly regarding the principles of limiting and terminating power, representative legitimacy, and legal certainty for political office at the local level.

From a constitutional perspective, Article 22E paragraph (1) of the 1945 Constitution of the Republic of Indonesia stipulates that general elections are held every five years as a means of renewing the mandate of people's sovereignty (C. P. Putri, 2025). This provision aligns with Article 18 paragraph (3) of the 1945 Constitution of the Republic of Indonesia, which affirms the position of the DPRD as a representative body of the people in the regions that obtains legitimacy directly through the electoral mechanism (Taqiuddin, 2026).

At the legislative level, Article 155 paragraph (1) of Law Number 23 of 2014 concerning Regional Government explicitly stipulates that the term of office of DPRD members is five years and ends when the DPRD members elected in the next election are inaugurated (Al Jinan et al., 2024). This norm emphasizes that the DPRD's term of office is not merely an administrative regulation, but rather a binding legal principle within the framework of representative democracy and inseparable from the constitutional system that guarantees the regular circulation of power.

However, the separation of National and Regional Elections with a period of approximately two to two and a half years, as ruled by the Constitutional Court, clearly creates irregularities in the DPRD's term of office. DPRD members elected in the 2024 election have the potential to remain in office beyond the constitutionally stipulated five-year limit, potentially even up to six and a half to seven years. This situation is problematic because the DPRD continues to carry out its representational, legislative, and oversight functions without a renewed electoral mandate from the people, the primary source of legitimacy in a democratic system.

In its legal argument, the Constitutional Court based the separation of elections on considerations of improving the quality of democracy, efficiency of election governance, and reducing the administrative burden and political complexity resulting from simultaneous elections. However, the ruling does not explicitly regulate the institutional transition scheme for the Regional People's Representative Council (DPRD), particularly regarding the clarity of the legal status and legitimacy of DPRD members' terms of office during the inter-election period. This normative vacuum demonstrates that the Constitutional Court's ruling creates new legal implications that have not been fully accommodated within existing positive legal frameworks.

Within the framework of constitutional law theory, the Constitutional Court is essentially positioned as a negative legislator, as formulated by Hans Kelsen, namely an institution authorized to annul statutory norms that conflict with the constitution without establishing new norms. Several academics, including Jimly Asshiddiqie, believe that Constitutional Court Decision No. 135/PUU-XXII/2024 tends to exceed this limit because it implicitly creates new normative consequences in the form of extending the DPRD's term of office, without an explicit basis in the 1945 Constitution or law. This situation creates a conceptual tension between the final and binding nature of the Constitutional Court's ruling and the principle of legality and legal certainty in a state based on the rule of law.

The findings of various academic studies following the ruling also reveal concerns about the potential decline in the political accountability of the Regional People's Representative Council (DPRD). Several constitutional law study centers and election monitoring institutions emphasize that the DPRD's legitimacy is largely determined by the certainty of the election cycle, which serves as an instrument for public evaluation and control of its representatives. When terms of office are extended without an election mechanism, this accountability relationship risks weakening, which in turn can erode public trust in regional representative institutions.

Historically, Indonesian constitutional practice has shown that term extensions of representative institutions without elections, both during the transitional periods of the Old and New Orders, were often accompanied by a decline in political legitimacy and a widening gap between representatives and their constituents. This historical fact reinforces academic findings that the periodization of power is not merely a technical-administrative issue, but rather a key normative foundation of constitutional democracy that guarantees the circulation of power and the sustainability of popular sovereignty.

Within the framework of Max Weber's legitimacy theory, the authority of the Regional People's Representative Council (DPRD) rests on legal-rational legitimacy obtained through legitimate, periodic, and competitive elections. If the DPRD's term of office is extended without a renewed mandate through elections, the foundation of this legitimacy is potentially degraded because it is no longer fully based on the consent of the people as sovereign. In such a situation, the DPRD retains formal legal validity, but its substantive democratic legitimacy is weakened.

Another significant consequence is the disruption of the principle of legal certainty (*rechtszekerheid*). The absence of clear transitional regulations creates ambiguity regarding the term limits of the people's representatives' authority and opens up opportunities for pragmatic political practices that could erode the principle of constitutional supremacy. In the long term, this ambiguity risks impacting the validity and public acceptance of the DPRD's strategic policies, including in the regional legislative process, budget determination, and the implementation of its oversight function over regional heads.

Based on the normative review, literature review, and various academic findings, it can be confirmed that Constitutional Court Decision No. 135/PUU-XXII/2024 has a profound impact on the term of office of the

Regional People's Representative Council (DPRD) and has the potential to trigger issues of democratic legitimacy at the regional level. Therefore, further steps are needed in the form of formulating a comprehensive constitutional transition scheme and legislative reconstruction, so that the separation of elections remains consistent with the principles of popular sovereignty, the periodization of power, and the supremacy of the constitution within the framework of a democratic state based on the rule of law.

The Crisis of Democratic Legitimacy of the Regional People's Representative Council (DPRD) from the Perspective of the Periodization of Power

The crisis of democratic legitimacy within the Regional People's Representative Council (DPRD) following Constitutional Court Decision No. 135/PUU-XXII/2024 is fundamentally rooted in fundamental problems related to the periodicity of power in a democratic state governed by the rule of law. The periodicity of power is a constitutional principle that affirms that every political mandate has a term limit and must be periodically renewed through democratic mechanisms. This principle not only limits power to prevent it from running unchecked but also ensures that popular sovereignty remains the primary source of legitimacy for representative institutions.

Within the framework of electoral democracy, the DPRD's legitimacy is derivative because it arises directly from the election process, a manifestation of popular sovereignty. Article 22E of the 1945 Constitution of the Republic of Indonesia not only stipulates that elections are held every five years but also implicitly stipulates a time limit for the legislative body's authority resulting from those elections. If the DPRD's term of office exceeds the five-year cycle without new elections, the relationship of legitimacy between the people's representatives and their constituents becomes normatively distorted. The DPRD retains formal legal validity, but loses the renewal of public legitimacy that serves as the moral and political foundation of its authority.

Within Max Weber's legitimacy theory, the authority of the Regional People's Representative Council (DPRD) is classified as legal-rational legitimacy, namely legitimacy based on adherence to rational, procedural, and predictable legal rules (Harfi et al., 2025). Periodic elections are the primary mechanism for maintaining the continuity of this legitimacy. If these periodic procedures are not implemented according to the established cycle, legal-rational legitimacy has the potential to decline. Extending the DPRD's term without elections can create what Weber terminology calls a legitimacy deficit, a situation where formal authority remains in place but social and political acceptance of that authority weakens.

Recent literature reviews support this analysis. Rayhan et al. (2024) state that extending the legislative term without re-elections or additional legitimacy mechanisms risks reducing public trust in representative institutions. In an electoral democracy, public trust is not simply a matter of perception but a structural element that determines the effectiveness of the representational and accountability functions. When the public considers that the DPRD no longer fully reflects the people's actual aspirations, the legitimacy of the resulting policy products will also erode.

The crisis of legitimacy of the Regional People's Representative Council (DPRD) following Constitutional Court Decision No. 135/PUU-XXII/2024 can be understood through a quality-of-democracy approach, not solely from a formal legal perspective. In modern democracies, the quality of democracy is largely determined by the consistency of the electoral cycle as a mechanism for evaluating power. When this cycle changes without a renewed mandate through elections, the principle of the circulation of power, the core of the democratic system, is disrupted.

In the literature on democratic backsliding, presented by Sjunnesson Ståhl and Nielsen (2025), democratic backsliding does not always occur through the dissolution of institutions or the open cancellation of elections, but can emerge gradually through institutional adjustments that reduce the intensity of political competition and accountability. Extending the DPRD's term without re-election, while procedurally valid, has the potential to reduce the frequency of public evaluation of its representatives. This narrows the space for democratic correction, weakening the people's control over legislative power.

Comparative empirical approaches also show a similar pattern. Various cross-national studies have found that when legislative terms are extended without additional legitimacy mechanisms, responsiveness to public aspirations tends to decline. Sholikah et al. (2024) emphasize that changes to electoral design without a legitimacy transition scheme will create tension between legal legitimacy and political acceptance. This means that the institution may remain constitutional, but it will no longer fully command adequate social trust.

In the Indonesian context, this issue has broader dimensions because the Regional People's Representative Council (DPRD) plays a strategic role in the regional legislative process, budget determination, and executive oversight. DPRD decisions directly influence the distribution of public resources and the direction of regional development. If this authority is exercised under conditions of questionable legitimacy, the resulting policies have the potential to face public resistance. In rapidly changing socio-political dynamics, the lack of an updated

electoral mandate can create a gap between current public preferences and the political decisions made by representatives.

Thus, the question that arises is not simply whether the Regional People's Representative Council (DPRD) is legally valid, but rather whether it retains sufficient democratic legitimacy to optimally carry out its representative function. Changing the term of office without a clear transitional design has the potential to create friction between institutional stability and the principle of accountability to the people as the holders of supreme sovereignty.

Furthermore, this legitimacy crisis also impacts the institutional relationship between the DPRD and regional heads. Regional heads who gain new legitimacy through regional elections potentially face challenges with DPRDs whose political legitimacy stems from previous elections. This lack of legitimacy can trigger political tensions, weaken checks and balances, and disrupt the overall stability of regional government.

Normatively, the principle of terminating power aims to prevent stagnant power and ensure the democratic circulation of political elites. When this principle is violated, even under the pretext of electoral effectiveness or efficiency, the foundations of constitutional democracy continue to erode. In this context, the DPRD's legitimacy crisis is not merely an administrative or technical issue, but a structural problem that touches the heart of representative democracy.

Based on theoretical analysis, literature review, and research findings, it can be concluded that the extension of the DPRD's term of office following Constitutional Court Decision No. 135/PUU-XXII/2024 has the potential to create a serious crisis of democratic legitimacy. This crisis is rooted in a deviation from the principle of the periodization of power and has direct implications for the quality of representation, accountability, and public trust in regional representative institutions. Therefore, addressing this issue requires a constitutional solution that is not only legally valid but also capable of restoring the DPRD's democratic legitimacy as a representation of popular sovereignty at the local level.

Constitutional Deadlock and the Emptiness of Regional Election Transition Mechanisms

Constitutional Court Decision No. 135/PUU-XXII/2024 not only raises questions about the democratic legitimacy of the Regional People's Representative Council (DPRD), but also creates a situation that can be categorized as a constitutional deadlock. This situation refers to a situation of normative impasse when the implementation of one constitutional norm has the potential to violate another constitutional norm, thus placing the state in a constitutional dilemma that is not easily resolved through available legal mechanisms. In the context of the separation of National and Regional Elections, this deadlock arises from the conflict between the obligation to implement final and binding Constitutional Court decisions and the principles of election periodization and the term of office of representative institutions.

Normatively, Article 24C paragraph (1) of the 1945 Constitution of the Republic of Indonesia affirms that Constitutional Court decisions are final and legally binding from the moment they are pronounced. This provision positions the Constitutional Court's decisions as a constitutional norm that must be implemented by all state organs. However, Article 22E of the 1945 Constitution explicitly stipulates that general elections are held every five years, which implicitly limits the terms of office of the DPR, DPD, DPRD, and the President and Vice President. When Constitutional Court Decision No. 135/PUU-XXII/2024 was implemented without an adequate transitional design, a normative tension arose between two equally binding constitutional mandates.

This conflict became even more pronounced when linked to positive legal provisions. Law No. 23 of 2014 concerning Regional Government explicitly stipulates that the term of office of Regional People's Representative Council (DPRD) members is five years, ending when the members elected in the next election take their oath of office. Under normal circumstances, this norm guarantees legal certainty and the periodicity of power at the regional level. However, the implementation of the Constitutional Court Decision, which shifted the schedule for Regional Elections, resulted in the absence of a "next election" within that five-year period, making the statutory norm unenforceable without violating the Constitutional Court's ruling. This is the essence of a structural constitutional deadlock.

This constitutional deadlock is exacerbated by the absence of a clear transitional mechanism for regional elections. Unlike the position of regional head, which recognizes the appointment of an acting regional head (Pj) as a transitional solution after the end of the term, the Indonesian legal system does not recognize the concept of acting DPRD members. As a collective institution, the Regional People's Representative Council (DPRD) cannot be filled through administrative mechanisms without elections, as this would directly contradict the principle of popular representation. Consequently, extending the DPRD's term of office is positioned as the only available option to prevent an institutional vacuum in the region.

However, the solution of term extensions actually creates new constitutional problems. From a constitutional theory perspective, term extensions without re-elections constitute the creation of a new norm not explicitly mandated by the 1945 Constitution of the Republic of Indonesia. Maulana (2024) emphasized that any change in the election cycle that directly impacts the terms of office of political officials must be accompanied by a clear constitutional transition framework to avoid prolonged normative conflict. The absence of such a

framework in Constitutional Court Decision No. 135/PUU-XXII/2024 indicates weaknesses in constitutional design in its implementation.

Comparative research findings indicate that democracies that successfully implemented electoral separation generally provide explicit transition mechanisms, whether through by-elections, term reductions or extensions accompanied by additional legitimacy, or formal constitutional amendments. Conversely, countries that implement changes to election design without clear transitional arrangements tend to experience political tension, decreased public trust, and the delegitimization of representative institutions. These findings strengthen the argument that constitutional deadlock is not merely a theoretical issue but has a real empirical impact on democratic stability.

In the Indonesian context, this constitutional deadlock has the potential to have a systemic impact on regional governance. The Regional People's Representative Council (DPRD), whose term of office was extended without re-election, continues to carry out its legislative, budgeting, and oversight functions, despite questionable legitimacy. On the other hand, the absence of the DPRD will lead to regional government stagnation and undermine the principle of decentralization guaranteed by the constitution. The state faces an equally problematic choice: violate the principle of the periodicity of power or allow an institutional vacuum at the regional level.

Theoretically, this situation reflects a systemic failure to harmonize constitutional norms with the decisions of the constitutional guardian institutions. The Constitutional Court, in its position as guardian of the constitution, ideally should not only consider the effectiveness and efficiency of elections but also ensure that its decisions do not create normative conflicts that undermine the consistency of the constitution itself. When the Constitutional Court's decisions instead create a constitutional deadlock, the Constitutional Court's constitutional function as a guarantor of legal certainty and democratic stability deserves academic evaluation.

Based on this overall analysis, it can be concluded that the separation of national and regional elections without a clear transition mechanism has created a structural and systemic constitutional deadlock. This deadlock is not merely a technical issue of election administration, but rather a serious constitutional problem that threatens the principle of the periodicity of power, the democratic legitimacy of the Regional People's Representative Council (DPRD), and the sustainability of local democracy. Therefore, comprehensive constitutional intervention and follow-up legislation are needed to break this normative deadlock and ensure that changes to the election design remain in line with the supremacy of the constitution and popular sovereignty.

4. CONCLUSION

It can be affirmed that Constitutional Court Decision No. 135/PUU-XXII/2024 has serious constitutional implications for the term of office of the Regional People's Representative Council (DPRD), democratic legitimacy, and the consistency of the principle of periodicity of power in a state governed by the rule of law. This study finds that the separation of National and Regional Elections without a clear transitional scheme has created a normative tension between the obligation to implement the final and binding Constitutional Court decision and the five-year periodicity principle as guaranteed by Article 22E of the 1945 Constitution of the Republic of Indonesia. The impact is not only administrative, but also touches the foundation of the DPRD's legal-rational legitimacy as understood in Max Weber's theory, and demonstrates symptoms of constitutional deadlock due to the lack of synchronization of constitutional norms and positive law. These findings reinforce the understanding that periodicity of power is not merely a technical arrangement, but rather the heart of constitutional democracy, guaranteeing elite circulation, political accountability, and legal certainty. Practically, this study provides an important lesson: any change in electoral design must be accompanied by an explicit constitutional transition framework to avoid a legitimacy crisis and a decline in the quality of local democracy.

In terms of scholarly contribution, this research enriches the study of constitutional law by integrating normative analysis, legitimacy theory, and the concept of constitutional deadlock in a more comprehensive reading of the implications of the Constitutional Court's Decision. This study not only highlights the formal legality aspect but also broadens the perspective towards the quality of democracy and the stability of decentralization, thus offering an analytical update in the literature on the Constitutional Court's authority and the periodization of power. However, this research has limitations because it focuses on a normative juridical approach with the scope of analysis on the Constitutional Court Decision Number 135/PUU-XXII/2024 and related regulations, without involving empirical data on public perception, regional political dynamics, or variations in social contexts across regions. Therefore, further research using empirical approaches, cross-regional comparisons, and public perception surveys is urgently needed to obtain a more comprehensive picture and serve as a basis for formulating election transition policies that are more appropriate, responsive, and oriented towards strengthening democratic legitimacy.

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