ODEC would support a governance reform package that includes:

- **Board of Managers**
  - Extend Board member terms from three years to five years.
  - Eliminate Board term limits.
  - Reduce the Board cooling-off period from two years to one year.
  - Increase Board transparency through public voting records.
  - Increase Board transparency through public Board meetings where practical.
  - Add state representation to the PJM Nominating Committee.
  - Recognize reliability, affordability, and efficient markets as components of the Board's public interest responsibilities.
- **Stakeholder Process**
  - Introduce a two-thirds sector-weighted approval threshold in lower-level committees.
  - Eliminate affiliate voting at lower-level committees.
  - Retain lower-level committees and technical forums as part of PJM's governance structure.
- **State Participation**
  - Consolidate and better coordinate existing avenues for state participation.
  - Permit advisory or informational state voting to communicate state perspectives to stakeholders and the Board.
  - Continue to explore opportunities for improved state engagement without granting formal voting rights or independent Section 205 filing authority.
- **Section 205 Filing Rights**
  - Grant PJM independent Section 205 filing rights over Energy Market, Ancillary Services Market, and RTEP matters.
  - Preserve meaningful stakeholder participation by granting the Members Committee corresponding "jump ball" filing rights that allow stakeholders to submit competing proposals directly to FERC.

Collectively, ODEC believes the reforms described above would improve transparency and accountability, strengthen confidence in PJM governance, preserve meaningful stakeholder participation, and better position PJM to address the reliability, affordability, transmission, and resource adequacy challenges facing the region while maintaining the fundamental characteristics that have historically distinguished PJM's governance model.