

UNITED STATES OF AMERICA

FEDERAL ENERGY REGULATORY COMMISSION

PJM Governance and Stakeholder Reforms

Docket No. AD26-7-000

COMMENTS OF THE NATIONAL CAUCUS OF ENVIRONMENTAL LEGISLATORS

July 20, 2026

We appreciate FERC addressing critical governance issues at PJM and welcome the opportunity to comment. As state lawmakers, we believe it is crucial that FERC prioritize reforms that ensure states can engage meaningfully in PJM processes and have access to sufficient information. Doing so will allow our states to more effectively fulfill our obligations and exercise our authority under the Federal Power Act.

The Federal Power Act recognizes states' authority over key energy policy issues, most notably in the realm of resource choice, siting, permitting, generation, and retail cost allocation. PJM's role in transmission planning, energy markets, and resource adequacy decisions — and the lack of a state voice in these processes — directly impacts our ability to fully and appropriately execute these duties while achieving state policy objectives.

Creating meaningful opportunities for state participation is a crucial step for improving PJM governance. We believe this can be accomplished by drawing on the lessons and precedents from other regions, including the New England States Committee on Electricity (NESCOE) and the Southwest Power Pool's (SPP) Regional State Committee (RSC).

We urge FERC to take action on the following:

- **Establish a formal governance role for a new or existing organization representing state interests.** This role could be based on the “direction to file” and regional policy functions exercised by state entities in other regions, such as the RSC in SPP or ISO-NE's NESCOE.
- **Provide this new or existing organization with the ability to submit alternative proposals to FERC for consideration** when stakeholder processes — or work among the stakeholders, states, and PJM — produce competing results. This mechanism would enable FERC to evaluate more than one option and function similarly to the New England Power Pool's “jumpball rights.”
- **Provide a seat on the Nominating Committee** for the PJM Board to a representative from the states.
- **Modify the Board makeup requirements** to provide two additional seats, including a seat to represent the interests of states and a seat to represent the interests of end-use customers.
- **Amend PJM's foundational operating agreement to codify an explicit public interest mandate** that requires PJM to balance system reliability and market efficiency with public interest objectives, explicitly including ratepayer cost containment and state public policy alignment.
- **Strengthen transparency** by allowing designated representatives of PJM state governments to attend Liaison Committee meetings.

Additionally, some practical modifications and adjustments to the PJM stakeholder process would generally improve the process and make decision-making more effective and transparent:

- **Record all PJM Stakeholder Meetings** and make these recordings publicly available.
- **Implement sector-weighted voting** in the Standing Committees to align committee work with the ultimate stakeholder decision-making process.
- **Publish and disseminate records of voting results** taken in all PJM committees, task forces, and similar standing, ad-hoc, or issue-specific stakeholder groups.
- **Allow media to be present** in all stakeholder process meetings.
- **Require cost impact analyses to be presented** during the First Read at the Senior Standing Committees.
- **Establish an Independent Transmission Monitor** to help control rising transmission costs and efficiently move forward with needed projects.

The governance reforms identified above would strengthen alignment between PJM decision-making and state policy objectives, while also improving transparency and accountability in the system. Energy affordability concerns and the need for a modernized grid are two issues that no single entity can solve. We look forward to continuing to work with PJM and FERC in our efforts to reduce costs and deliver customer reliability.

Sincerely,

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Illinois Rep. Rita Mayfield (IL-060)	Illinois Sen. Cristina Castro (IL-022)
Illinois Sen. David Koehler (IL-046)	Illinois Sen. Laura Murphy (IL-028)
Illinois Sen. Rachel Ventura (IL-043)	Indiana Rep. Carolyn Jackson (IN-001)
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Maryland Del. Kris Fair (MD-003)	Maryland Del. Jessica Feldmark (MD-012A)
Maryland Del. Linda Foley (MD-015)	Maryland Del. Catherine Forbes (MD-043B)
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Virginia Del. Sam Rasoul (VA-038)	Virginia Del. Irene Shin (VA-008)
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