



July 5, 2022

Shore Power Public Docket
California Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: Innovative Concept Application: Wallenius Wilhelmsen

PMSA is pleased to support Wallenius Wilhelmsen in their At Berth Regulation Innovative Concept Application. The Innovative Concept process is an important method to improve operational flexibility under the amended At Berth Regulation. The disparate operational needs of ocean carriers necessitate increased flexibility to maximize successful regulation implementation. Wallenius Wilhelmsen proposes an innovative method to achieve early emission reductions in order to obtain additional VIEs for use in 2025-2027. Early emission reductions benefit the local community and can accelerate deployment of technologies that reduce emissions from maritime sources. Wallenius Wilhelmsen's proposed approach maintains the emission reduction goals of the amended At Berth Regulation providing needed operation flexibility.

Please note, though, that the implementation of the innovative concept does not obviate the needs outlined by both Wallenius Wilhelmsen and PMSA in our respective letters on the Interim Evaluation. This is truly an innovative concept. That the developers of the innovative concept may not be ready by the deadline and vessel retrofits will also be delayed past the 2025 deadline all lend credence to the need for both approval of the innovative concept and relief or deadline extension of the regulation requirements.

Only together will the amended At Berth Regulation be successful.

PMSA requests that CARB approve Wallenius Wilhelmsen's Innovative Concept Application.

Sincerely,

A handwritten signature in blue ink that reads "Thomas Jelenić". The signature is fluid and cursive, written over a light blue circular stamp.

Thomas Jelenić
Vice President