



July 5, 2022

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

Subject: Innovative Concept Application: Carnival

PMSA is pleased to support Carnival 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. During development of the At Berth Regulation amendments, California Air Resources Board (CARB) staff and Board members confirmed that the Innovative Concept would be a tool to continue implementing the fleet averaging in a manner similar to the original 2007 At Berth Regulation. Carnival's proposed fleet averaging approach maintains the emission reduction goals of the amended At Berth Regulation providing needed operation flexibility.

PMSA requests that CARB approve Carnival'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 horizontal line.

Thomas Jelenić
Vice President