



July 5, 2022

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

Subject: Innovative Concept Application: Pasha

PMSA is pleased to support Pasha 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. Steamships present a challenge for control under the At Berth Regulation. Steamships are not amenable to shore power and there are no currently verified technologies to control emissions from steamships. Pasha proposes two methods to reduce emissions from vessels at berth that include both utilizing wind power and deploying emission capture technology developed for their steamships. Such approaches are necessary to successfully implement the At Berth Regulation. Pasha's proposed approach maintains the emission reduction goals of the amended At Berth Regulation providing needed operation flexibility.

PMSA requests that CARB approve Pasha's Innovative Concept Application.

Sincerely,

A handwritten signature in blue ink that reads "Thomas Jelenić". The signature is fluid and cursive, with the first name being more prominent.

Thomas Jelenić  
Vice President