



July 5, 2022

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

Subject: Innovative Concept Application: Matson

PMSA is pleased to support Matson 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. Matson'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 Matson's Innovative Concept Application.

Sincerely,

A handwritten signature in blue ink, which appears to read "Thomas Jelenić". The signature is fluid and cursive, written over a light blue horizontal line.

Thomas Jelenić  
Vice President