

Page	Section	Description	Item	Concern / Question / Comment #1	Concern / Question / Comment #2	ITS Recommendation
						As requested by CARB
24	93130.7	Vessel Compliance Checklist	(3)	1 Hr to connect and disconnect is not enough. Provide calculations and study methods used to determine how the 1 hr. time to connect and disconnect was determined. How many Terminal operators and ship owners were surveyed? What were the types of ships? What types of control technologies (lift on/lift off, barge, fixed cable reel) were used? What kind of labor was required?	1 Hr proposal makes obsolete the numerous Vessel operators who invested \$millions\$ in mobile CI or AMP containers that are lifted on and lifted off during shorepower operations. 1 Hr proposal makes obsolete the bonnet barge based on the operations that has taken place at ITS. 1 Hr proposal will increase the disagreements between Terminal and Vessel Operators. CARB will require a full time arbitration department due to the weekly complaints and disagreements between Terminal and Vessel operators. Will CARB have an Arbitration department? If so, what will be the procedures and steps? This Arbitration dept and related rules should be in place prior to passing this At Berth Amendment.	1) Keep and modify existing language. Eliminate 1 hr proposal. Retain current concept of 3 hr rule total aux hrs, but modify to 5 hrs max based on experience. 2) If CARB wants to reduce the time on Aux Hrs, CARB will provide legitimate study with proven test methods that show 1 Hr is achievable.
24	93130.7	Vessel Compliance Checklist	(3)	Who will identify the time when 'Ready to Work' starts and who will monitor to ensure connection is completed within 60 min? Who will identify the time when 'Pilot on Board' and who will monitor to ensure connection is completed within 60 min?	Terminal logs date/time power sent to vault and date/time power is disconnected. Terminal is not manned to stand by and determine when the 60 minutes start, when the Terminal sends power and when the Ship connects to the shorepower vault. Vessel operator already logs this information and should solely provide this data to CARB.	Keep and modify existing language. Remove Terminals of responsibility for enforcing time constraints. OGV At Berth rule was made for the Vessel Operators and the existing language should remain the same with an increase in the total hrs on Aux engines. If looking for responsible party, consider Port involvement.
26	93130.8	Vessel Visit Exceptions		How about vessels that are under repair and not loading/unloading cargo? Do these qualify under this rule?		Add language stating that some exceptions not listed will be considered on a case by case basis. TIEs/VIEs should not be used for these scenarios.
26	93130.8	Vessel Visit Exceptions		Are weather related damages to the cold ironing equipment during sailing fall under Force Majeur and considered an exception? If not, how would CARB treat this situation?	When ship arrives with damage equipment, who will coordinate the bonnet barge? What if bonnet barge is not available? Will Exception be applied under Force Majeur? If not, how would CARB handle this?	Add weather damage to exception. VIEs/TIEs and Remediation penalties should not be applicable.
28	93130.9	Terminal Operator Requirements	(a)(3)	Explain how the liability in this scenario falls on the Terminal Operator instead of 'it depends'? What if Control technology design is flawed and cables are too short during commissioning? What if the Terminal only accepts Port side berth ships, but the Vessel Operator installs Starboard side control technology? What if Landlord installed vaults were incorrectly placed so shorepower operation is not possible? What if the barge company doesn't have enough barges to service the ship?	We're losing touch on the spirit of this regulation. Ships are making every effort to reduce emissions. Ships have changed fuel, slowed down and now connecting to the shorepower 70+% of the time. Why does the rule need to be amended to this extreme? Just change the % and keep the existing language.	Add this scenario to Exceptions. TIEs/VIEs or Remediation penalties are not applicable. In these scenarios, the Vessel and Terminal Operator including the Port and the Barge company made every effort to connect. No group should be penalized or required to use a TIE/VIE? If CARB strongly believes that a group must be at fault than CARB must add language that states Ports and Barge companies are liable for Remediation penalties and be given Port Incident Exceptions (PIE) and Barge Incident Exceptions (BIE). Add language that responsibility depends on the who's at fault. Do not default liability to Terminals. WARNING: With several parties potentially liable, this will cause numerous 'finger pointing' and CARB will require an Arbitration process that will rival a small claims court. Determining who's at fault will take months if not years. Attorneys, consultants, etc will cost tens of thousands if not more. Costs/Time/Personnel required to run this Arbitration Dept will be enormous.

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28	93130.9	Terminal Operator Requirements	(a)(3)	Adding to the above. CARB must understand that the Vessel Operator and the Terminal Operator have a service relationship only. Vessels come along side and Terminal operator loads/unloads the containers. Terminal Operators are not exposed to Vessel side decisions and do not have any input on the type of ships purchased or control technologies used. Therefore, it is not the Vessels best interest for another party to coordinate bonnet barges. Just not good business sense. However, Terminals will reimburse Vessel operators if it's been mutually agreed that the Terminal was at fault.	Coordination of the bonnet barge should always fall on the Vessel operator who knows their ship specs and already has a relationship with the barge company. If it's been determined that the Terminal is responsible, Terminal will reimburse Vessel Operator. Note: It is rare that the Terminal has any involvement with the bonnet barge operations. In many cases, the barge crew boards the ship on the water side and is never seen by the Terminal.	All bonnet barge or alternative solutions should be coordinated by the Vessel operator. Terminals are not trained, experienced or deal with ships. However, if the Terminal is found to be at fault, Terminal operator will reimburse Vessel operator.
28	93130.9	Terminal Operator Requirements	(b)	Language states shared responsibility. However, the landlord Port and potentially the barge companies could be at fault.	If finding the responsible party is a top priority for this At Berth Amendment then CARB must look at the Ports, Barge companies, utilities, etc. Under represented Terminals should not be the default for liability.	If truly a shared responsibility, CARB must add language that states Ports and Barge companies are liable for Remediation penalties and be given Port Incident Exceptions (PIE) and Barge Incident Exceptions (BIE). Revise language that states responsibility depends on the who's at fault. WARNING: With several parties potentially liable, this will cause numerous 'finger pointing' and CARB will require an Arbitration process that will rival a small claims court. Determining who's at fault will take months if not years. Attorneys, consultants, etc will cost hundreds of thousands if not more. Costs/Time/Personnel required to run this CARB Arbitration Dept will be enormous.
28	93130.9	Terminal Operator Requirements	(c)	Terminal operators have no control or any say relative to the control technologies. Vessel operators decide which control technologies to install.	Terminal's do not have the man power or expertise to determine if control technologies are approved or operational. Vessel operators own the control technologies and have full knowledge of status/condition of equipment. Vessel operator must take the lead and discuss with Terminal operator.	Change proposed language to state that Vessel operator must notify Terminal operator of status of control technologies and Vessel operator must determine if commissioning or repairs are needed. Vessel operator must then also decide if alt solution i.e., barge is required. In this case, Vessel operator coordinates the barge. Alt solution or barge costs belong to liable party.
29	93130.9	Terminal Operator Requirements	(d)(1)	Vessel operators control their ships and sailing schedule. Vessel Operators should notify Terminals via email with approved emission control strategy status.	Terminal have limited access to Vessel information, schedules, etc. Terminal do not have the man power to obtain this information. All this information is already held by the Vessel operator.	Same as above.
29	93130.9	Terminal Operator Requirements	(d)(2)(A)	All notifications should be driven by the Vessel operator who owns and operates the ship. Terminals are completely blind of the Vessel status.		Same as above.
29	93130.9	Terminal Operator Requirements	(d)(2)(B)	Positioning is the responsibility of the Vessel Operator, Pilots and Agents.		Delete this language. This does not apply to ITS in Long Beach.
29	93130.9	Terminal Operator Requirements	(d)(2)(E)	Disconnect no more than 1 Hr before Pilot on Board. Please provide study methods used to determine the 1 Hr window.	What if Ship's captain says Vessel will remain beyond the 1hr after Pilot on Board? Terminal has no authority in this case since Vessel hires the Pilot.	Keep existing language that has the Vessel operator ultimately responsible for deciding when to sail since Vessel operators hire the Pilot. Eliminate 1 Hr proposal. Keep and modify existing language from 3 hr aux to 5 hr aux.

Page	Section	Description	Item	Concern / Question / Comment #1	Concern / Question / Comment #2	ITS Recommendation
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29	93130.9	Terminal Operator Requirements	(d)(3)	Redundancy is inefficient. Vessel operator already reports this information. PLEASE avoid duplicate reporting. PLEASE do not try to enforce CARB rules through the Terminal operator. Terminal and Vessel operators will log the TIE/VIE, but what if the Port and/or the barge company is found to be responsible, partial or otherwise?	Terminal should be limited to reporting data that is available and applicable to the Terminal operator. Irrelevant data such as IMO #, name, address, email, telephone #, compliance instructions checklist, tier rating of the engine should not be the Terminal's responsibility. Terminal does not have the manning to obtain this kind of information on each call. Terminals should not be bullied into enforcing CARB's hopes to vet Vessel operator data. CARB should properly staff their department to enforce these rules and validate the data given to CARB.	Narrow down Terminal operator reporting requirement based on relevancy. Data reported should be the Voyage #, date and time of arrival/departure, connect/disconnect. Any issues with connecting/disconnecting, special notes i.e., commissioning required would also be included. Ports and barge company liability needs to be added to the Amendment. Ports and barge companies should also have PIEs or BIEs as well as be subject to remediation penalties. Until such language is in place and a full CARB Arbitration process is absolutely clarified with written and mutually agreed procedures, this Amendment should be placed on hold. Additionally, CARB should staff properly to enforce their rules and validate data received from Vessel operators.
30	93130.9	Terminal Operator Requirements	(d)(3)(L)	Terminals do not have access to Vessel Operator ship and engine specs. Vessel Ops own/charter their ships and readily have this information available to them. Engines specs are irrelevant to a Terminal operator. Terminal operator does not have the staffing to obtain this information.	Again, duplicate effort and inefficient. Terminal is not familiar with this data and does not have the manning to obtain this data.	See above. Ask Terminal operators to provide data that the Terminal operator has control over.
30	93130.9	Terminal Operator Requirements	(e)(2)	How will Terminal Operatos be trained on the on line system? Will spreadsheets be uploadable?	Will CARB site provide downloadable spreadsheet templates?	CARB to provide excel spreadsheet template for Terminals to use on a daily basis. Document should be unlocked. Drop down menus are highly recommended. Formulas for each cell should be available on separte worksheet for reference. Operator must be able to upload daily spreadsheet in CARB system without any issues. Homeland Security sensitive data will not be included and should not be asked.
32	93130.10	Terminal Exceptions	(d)	Who/Where do we send request for testing? What kind of information does CARB need to request the test?	Once submitted, how long before approval or rejection is received? In the meantime, vessel is an exception?	CARB to confirm that TIE/VIE and Remediation penalties are not applicable in this scenario. Testing alt tech should fall under exception. Connection and disconnection should still be reported, but aux use during these tests should be an exception. TIE/VIE and Remediation penalties are not applicable.
32	93130.10	Terminal Exceptions		General scenarios: What if the previous ship damaged the Terminal shorepower vault prior to sailing? Repairs will take weeks to complete. What happens to the next ship who can't plug in because the priveious ship damaged the vault?	There are clearly exceptions and there should be language that states request for exceptions will be considered by CARB on a case by case basis.	Add sentence or paragraph that states unusual circumstances (definition required) will be addressed on a case by case basis by CARB. All parties are subject to liability. CARB to add Port and Barge company PIE/BIE including being subject to Remediation penalties for these unusual circumstances.

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33	91130.11	VIE/TIE	(a)(1)	1) Applying previous years ship calls to determine TIE/VIE is not inline with reality. Ship calls should be derived from current year. Depending on the Alliance, calls to each Terminal may vary. Please consider TIEs based on current year and not based on previous year. Volumes could drastically change from one year to the next. 2) On another note, adding BIE/PIE/TIE/VIE language is another layer of complexity. It will surely require CARB to set up an Arbitraion dept and possibly an Appeals process which will cost CARB more staffing and more money. All the Remediation penalties will go to this and not the emission reduction. 3) BIE/PIE/TIE/VIE will become a highly sought commodity. Does CARB want to deal with this?	What if Terminal has 100 calls in the previous year, but the current year to date is projecting 200 calls? Past year would only give Terminal 5/15 TIEs vs 10/30 TIEs for 200 ships. It is simply illogical to use past year data.	Eliminate BIE/PIE/TIE/VIE and Remediation penalties all together. Go back and modify existing language to a higher % of required connections. Treat exceptions as excpetions. OR 2) Let Ports, Barges, Terminals and Vessels accumulate PIE/BIE/TIE/VIE through the year. CARB reconciles at end of year after total vessel calls are confirmed, CARB will reconcile qualified PIE/BIE/TIE/VIE and notify Ports, Barges, Terminal and Vessels with applicable PIE/BIE/TIE/VIE. Anything in excess would be subject to Remediation penalties. Appeal machinery begins. All cases pending Arbitration will be reconciled with the actual year or the year CARB decisions is made. OR 3) Modify existing quarterly data submission language. When Ports/Barges/Terminals and Vessel operators submit their data, CARB can reconcile and determine which PIE/BIE/TIE/VIE are applicable. Remediation penalties will than be applied. Appeal machinery begins. All cases pending Arbitration will be reconciled with actual year or the year CARB decision is made.
33	91130.11	TIE	(b)	Table: 2025-2028 reduction from 15% to 5% is too drastic.	5% is too small. 10% should be the default %.	2024-2026 reduction changed to 10%. Replace 5% with 10% going forward.
34	91130.11	VIE/TIE	(c)	BIE/PIE/TIE/VIE should not have a shelf life. It should be used to reward those who do follow the OGV At Berth rule.	What does it hurt? Either the stakeholders are so good at following that the allowances will not be used OR every BIE/PIE/TIE/VIE will be all used up so there won't be anything to carry over.	Allow excess BIE/PIE/TIE/VIE to be carried over to the following year without expiration. Older BIE/PIE/TIE/VIEs must be used first.
34	91130.11	VIE/TIE	(d)	TIEs should be traded to other Terminals if legally related or part of a consortium through Carrier alliances.	Based on pg 43 Remediation Fund Hourly Account, a 24 hr BIE/PIE/TIE/VIE is worth \$45,600. Expiring or not, these should be made available to others.	Add language that states companies who have legal relationships will be able to exchange TIE/VIE. Each TIE/VIE will need a s/n or tracking number recorded by CARB.
34	91130.11	VIE/TIE		For those that comply each year and stay under the CARB radar, how will these ports, barge, terminals or veseel opertors be rewarded? Regulation/Amendment focuses on failures.	All spend millions of \$ on shorepower. Very little happens for those who comply. The private sector is afraid of CARB. Is this what CARB wants? CARB needs to reach out and support those who meet the regulations targets.	Add an annual incentive program i.e., additional BIE/PIE/TIE/VIE and Remediation credits to those who meet rules. This should be awarded annually and should not expire.
38	31130.14	Terminal and Port Plan Interim Eval	(a)(3)	Terminal Interim Evaluation Plan: Current rule provides a template to complete. Will this be available on line or downloadable to be completed? What time line i.e. past/projected, 12/24/36 months is the basis of our information?	Technical feasibility study? What does this mean? Who is responsible for this? How much will it cost? Terminals do not have the manning or budget to complete feasibility studies. Ports own the land. Ports should be liable for this.	Involve the Ports and when necessary the utility company. Make the land owner/utility company accountable. Ports should lead any project that require any construction on their property.
41	31130.15	Remediation Fund Use	(a)	Who is the Remediation Fund Adminstrator? 3rd party, public/private, gov't entity? Can BIE/PIE/TIE/VIE be used in place of Remediation penalties or visa versa? What happens when all the BIE/PIE/TIE/VIE are used up? Does it automatically go to Remediation penalties?	How will this money be used? Could the Port, barge, Terminal or Vessel operator offset Remediation penalties by leveraging other green projects? In this case, emissions are being reduced immediately and not stuck in some dept who has to go through a grant process that will take years before any emission reductions, if any, takes place.	Add language that states BIE/PIE/TIE/VIE are interchangeable with Remediation penalties. All Remediation penalites can be offset by Port, Barge, Terminal or Vessel operator capital expense projects that show emission reductions. Projects open, but not limited to, the following: near zero RTGs, Tier4F THs, electric small forklift, replacement of diesel generator with battery or alt fuel, building additional shorepower vaults, retrofitting existing vehicles to near zero or zero emission, solar, wind, renewables, etc.

Page	Section	Description	Item	Concern / Question / Comment #1	Concern / Question / Comment #2	ITS Recommendation
						As requested by CARB
42	31130.15	Remediation Fund Use	(b)	Penalty qualified circumstances: What about ships who come along side for repairs? No cargo being loaded/unloaded. How does CARB treat this ship if it does not have cold ironing capability. Do all the At Berth rules apply?	What if somekind of scenario occurs that is not covered by any of the conditions of this At Berth rule?	Add sentence or paragraph that states unusual circumstances (definition required) will be addressed on a case by case basis by CARB. All parties are subject to liability. CARB to add Port and Barge company PIE/BIE including being subject to Remediation penalties for these unusual circumstances. Utility companies should be added to potential responsible parties.
42	31130.15	Remediation Fund Use	(c)	7 calendar days to submit request. Assuming parties agree who will pay penalties, 7 days may still be difficult. If parties disagree, than what happens? What is the CARB grievance process for disagreements?	Sounds like another layer of bureaucracy will cause additional CARB administrative nightmare. Companies will end up with costly attorneys and delays will push settlements and payments into the future with only the Attorneys profiting and emissions still not being addressed.	Change Amendment language to quarterly. CARB to provide simple excel spreadsheet to be completed, but uploadable to CARB website without all cells filled. CARB website to email reminders of missing/pending data.
42	31130.15	Remediation Fund Use	(d)	Will there be one person or a dept(s) deciding if the Remediation request is eligible? What dept(s)?	Is there an appeals process?	CARB to create and fund another department to handle the Remediation penalties, appeals process, settlement process.
43	31130.15	Remediation Fund Use	(e)	Remediation penalty payment within 30 days. If CARB allows liable parties to offset penalties with emission reduction projects, how would CARB administer this?	Payment program?	CARB to issue an invoice or payment voucher to the Port/Barge/Terminal or Vessel operator responsible. CARB to publish where Remediation penalties will be spent. CARB adds Remediation penalty payment option for liable party that will replace direct payments to CARB. Such options would leverage emission reduction project for that year i.e., purchase Tier4F, NZ, ZE or alt power vehicles, retrofits, renewables, shorepower vault investments, etc.
43	31130.15	Remediation Fund Use	(f)	Kindly confirm how rates were determined. For example, \$1900 x 24 hrs = \$45,600 per day. How did CARB determine that ship emissions are equivalent or cost \$45,600 per day?		Reduce hourly rate.
43	31130.15	Remediation Fund Use		How is the rate divided if multiple parties are responsible? On pg 48, Summary of Responsibilities, multiple parties are mentioned. How is Remediation divided between Ports/Barge/Terminal/Vessel?	On pg 48, Summary of Responsibilities, Ports and barge companies are responsible parties, but not mentioned in the Remediation penalties. Ports and barge require incident exceptions i.e., PIE/BIEs. What if utility company is unable to install infrastructure? How do they get penalized?	Add language that states utility companies may be subject to penalties. Remediation penalties can be divided between responsible parties. Once total penalties are calculated and liability % is determined by CARB, responsible parties shall pay their % portion.
43	31130.15	Remediation Fund Use		Remediation Fund will scare Vessel Operators who are considering calling LA/LB. Vessel Operators will shift towards OR, WA, Canada, East Coast and Mexico.	Remediation penalties should be removed all together. Eliminate the complication.	Eliminate any use of BIE/PIE/TIE/VIE and Remediation penalties. Use and modify existing language and raise the % of ships that need to connect.
48	93130.16	Remediation Fund Administration	(18)	Kindly apply the Remediation Administrator Force Majeur language to the Vessels, Ports and Terminal Exceptions.		Add similar Force Majeur language to Vessel, Ports and Terminal Exceptions language.
48	93130.16	Remediation Fund Administration		Ports, Barge, Terminals and Vessel operators should have other options to settle the Remediation penalties.		All Remediation penalties can be offset by Port, Barge, Terminal or Vessel operator capital expense projects that show emission reductions.
48	93130.17	Summary of Responsibilities	Table 5 / Pg 48	Based on table, multiple parties can be responsible. How does CARB divide up BIE/PIE/VIE/TIE between responsible parties. Who determines the %?	When parties share responsibility, only % of responsibility should be applied to BIE/PIE/TIE/VIE or Remediation penalty. Using a whole BIE/PIE/TIE/VIE for a 1 or 2 hr delayed connection is poor use of the exception.	BIE/PIE/TIE/VIE and Remediation penalties should be interchangeable options. Add language that states BIE/PIE/TIE/VIE and Remediation penalties will be prorated to % of responsibility to be Administered by CARB.

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						As requested by CARB
48	93130.17	Summary of Responsibilities	Table 5 / Pg 48	BIE/PIE/TIE/VIE and Remediation should be interchangeable. If whole days, BIE/PIE/TIE/VIE should be applicable, but if emissions are in hours, Remediation should be applied or somekind of offset CapEx project.		BIE/PIE/TIE/VIE and Remediation penalties should be interchangeable options. Remediation penalites can be offset by Port, Barge, Terminal or Vessel operator capital expense projects that show emission reductions.
49	93130.17	Summary of Responsibilities	Table 5 / Pg 49	Compliance Eval: Scenario 2: Remove Terminal responsibility from Berth with No Shorepower (SP) and Veseel has SP. Depending on the Lease, the Port is the landlord and responsible for the property and constructing shorepower assets.	Should be Table 6 since different condition.	Remove Terminal and add the Port on Scenario: No Shorepower, but has other CAECS. Change to Table 6.
49	93130.17	Summary of Responsibilities	Table 5 / Pg 49	Compliance Eval: Scenario 3: Remove Terminal responsibility from Berth with No Shorepower (SP) and Veseel with No SP. Vessel is responsible for the ship and coordinating CAECS. The Port is the landlord and responsible for the property and installing shorepower assets.	Should be Table 6 since different condition.	Remove Terminal and add the Port on scenario: No Shorepower, but has other CAECS. Change to Table 6.

Scenarios: CARB, please answer questions.					
	Terminal and Vessel Shorepower capability?	Details:		Question 1:	Question 2:
1	Terminal capable / Vessel capable:	ITS has 4 single berths vs one single linear berth. At ITS, Port is responsible for installing SPOs & all berth infrastructure. ITS berth SPO is damaged. Several other SPOs available. Ship is too large to shift in single berth design. Unable to reach bollards. Ship does not connect to shorepower.		Who is at fault?	Who is responsible for calling alt solution? What if barge is not available? How is this reported to CARB? Can you use BIE/PIE/TIE/VIE or Remediation?
2	Terminal capable / Vessel capable:	ITS has always supported Port side shorepower control technologies. Ship arrives with Starboard side control technology. Operationally impossible to turn ship around. Ship does not conect.		Who is at fault? What if last visit, control tech was on Port side?	Who is responsible for calling alt solution? What if barge is not available? Can you use BIE/PIE/TIE/VIE or Remediation?
3	Terminal N/A / Vessel capable:	ITS berth vault is not accessible due to Crane under repair. ITS planned to complete repairs and move crane to access vault 2nd Shft. Ship was suppose to arrive on 2nd shift, but instead arrives on 1st shift. ITS crane has not been repaired, but ship comes along side & connects. Ship not connected during 1st shift, but does connect during 2nd shift.		Who is at fault for uncaptured emissions on 1st shift? Does CARB expect Vessel to remain at anchor? Does CARB expect Terminal to delay loading/unloading?	Who is responsible for calling alt solution? What if barge is not available? Can you use BIE/PIE/TIE/VIE or Remediation?
4	Terminal capable / Vessel capable	Ship authorizes Terminal to send power to SPO vault. Ship is unable to sync up to SPO for 4 hrs. After 4 hrs, ship connects.		Do you use VIE or Remediation penalty for missed 4 hrs?	
5	Terminal capable / Vessel capable	New ship calls ITS. Comissioning required. Ship cable is to short too connect to berth SPO vault. No other cables or vaults available.		Who is at fault? What steps does CARB expect Vessel or Terminal to take?	What if this happened after ship was comissioned? In many cases, these ships are repaired overseas and parts are replaced. Terminals are not made aware of this.
6	Terminal NOT capable / Vessel capable	ITS SPO vault damaged by previous ship who connected to SPO vault. Previous ship sails away and next ship arrives, but unable to connect.		Who is at fault?	Who is responsible for calling alt solution? What if barge is not available? Can you use BIE/PIE/TIE/VIE or Remediation?
7	Terminal capable / Vessel NOT capable	ITS SPO vaults are available. Ship is not shorepower capable. Ship calls barge company. Barge does not show or there are no barges available for their time.		Who is at fault? What if barge shows up next day? Who is responsible uncaptured emissions? What if barge is available on Day 2?	Can you use BIE/PIE/TIE/VIE or Remediation?
8	Terminal capable / Vessel capable	Unable to connect		Regardless of who's at fault.	What if you're out of BIE/PIE/TIE/VIE? Everything falls under Remediation penalties?