

April 23, 2018

Clerk of the Board  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

*Submitted electronically at*

[https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=lcfs18&comm\\_period=A](https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=lcfs18&comm_period=A)

**Subject: Public Comment on Proposed Amendments to the Low Carbon Fuel Standard Regulation and to the Regulation on Commercialization of Alternative Diesel Fuels – EER Category Expansion**

Dear Clerk of the Board:

On behalf of the member companies of the Pacific Merchant Shipping Association (PMSA), we ask that the California Air Resources Board (CARB) expand the list of categories for eligibility of the Low Carbon Fuel Standard (LCFS) funding through the Energy Economy Ratios (EER) program as opt-in credit generating opportunities. PMSA is a nonprofit association of owners and operators of marine terminals and US- and foreign-flagged vessels operating throughout the world who service California's trade demands through California's commercial ports. PMSA requests that the following programs and activities at California's seaports be included as candidates for rebate funding through this program:

1. Ocean going vessel use of shorepower – whereby vessels shut down their diesel powered auxiliary generators while secured and stationary in port, and plug into the grid to provide power to the vessel.
2. Cargo Handling Equipment (CHE) – whereby electrification or alternative fuels, which provide a greenhouse gas benefit as compared to traditional petroleum-based diesel fuel, are used to power cargo handling equipment.
3. Use of LNG or other or alternative fuels, which provide a greenhouse gas benefit as compared to traditional petroleum-based marine distillate fuels, replace traditional fuels; while underway and while secured and stationary in port.

The opportunity to opt-in for credit generating opportunities in these categories will create meaningful incentives for ocean carriers and terminals to use low carbon-intensive options that will reduce greenhouse gases. In addition, by creating opt-in credit generating opportunities, CARB will also support its existing regulatory programs that seek to reduce criteria and toxic pollutants from these source categories.

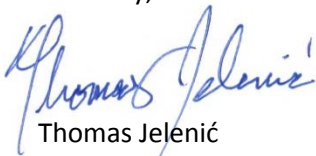
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Thank you for consideration of these comments. PMSA is available to discuss these comments in more detail with staff at any time.

Sincerely,

A handwritten signature in blue ink that reads "Thomas Jelenić". The signature is written in a cursive style with a large initial 'T'.

Thomas Jelenić  
Vice President