



July 5, 2022

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

Subject: Innovative Concept Application: Hapag Lloyd

PMSA is pleased to support Hapag Lloyd 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. Alternatively-fueled container ships present a challenge for deployment to California under the At Berth Regulation. There are no currently verified technologies to control emissions vessels using a fuel other than marine distillate. Hapag Lloyd proposes the deployment of an alternatively-fueled vessel that reduces emissions in all aspects of operation. Such approaches are necessary to successfully implement the At Berth Regulation and to reduce the environmental footprint of the maritime sector globally. Hapag Lloyd's proposed approach maintains the emission reduction goals of the amended At Berth Regulation providing needed operation flexibility.

PMSA requests that CARB approve Hapag Lloyd'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