

**DOCKETED**

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**PMSA Comments on 2026-7 Draft Investment Plan**

*Additional submitted attachment is included below.*

May 19, 2026

Mabel Aceves Lopez  
California Energy Commission  
715 P Street  
Sacramento, California 95814

**Re: Staff Draft Report – 2026-27 Investment Plan Update for the Clean Transportation Program**

Dear Ms. Lopez,

On behalf of the members of the Pacific Merchant Shipping Association (PMSA), which include ocean carriers and marine terminals operating at California's public seaports, we write to provide comments on the 2026-27 Investment Plan Update for the Clean Transportation Program.

Unfortunately, it is difficult to provide comments on how well this proposed investment strategy sustains or effectively invests in light, medium and heavy-duty ZEVs due to a lack of contextual information accompanying this plan. Tables 1, 2, and 3 detail complementary funding for ZEVs and ZEV infrastructure as well as recent funding opportunities, but there are no monetary figures from these recent investments nor any historical investment quantities from which to evaluate cost-effectiveness. Accordingly, it is difficult to assess whether this investment strategy offsets or exacerbates inequitable prior investments.

Because the draft plan lacks any data related to the effectiveness of the proposed investment strategies, it is impossible to determine whether the proposed allocation is appropriate. Specifically, what impact on greenhouse gases (GHG) or other emission reduction is achieved with the proposed or an alternative quantity? Page 2 of the draft plan notes that heavy duty vehicles are the most polluting. Given that the medium and heavy-duty ZEV markets are more nascent than light duty, and the cost of procurement remains more costly, it is questionable whether the comparable funding levels are appropriate. Given the documented success of light duty market penetration and the substantial need in medium and heavy duty, it may be more prudent to increase the medium and heavy-duty allocations to make gains in the more challenging market.

This approach informs other future policy decisions. As we look toward future growth in the maritime sector, for vessels at-sea and equipment ashore, it is critical to build on lessons learned to ensure funds support investment where the need is the greatest and most impactful. PMSA supports an approach by the Energy Commission which focuses first on policies that support continued investment in infrastructure to sustain the growth of nascent markets.

It would be helpful to have additional contextual information in order to support the proposed investment strategy and support future policy discussions by the Energy Commission.

Thank you for your consideration,



Jennifer Cohen  
Vice President