

DOCKETED	
Docket Number:	23-SB-02
Project Title:	SB X1-2 Implementation
TN #:	270692
Document Title:	PMSA Comments - Draft Transportation Fuels Transition Plan
Description:	N/A
Filer:	System
Organization:	PMSA
Submitter Role:	Public
Submission Date:	6/17/2026 2:46:32 PM
Docketed Date:	6/17/2026

*Comment Received From: PMSA
Submitted On: 6/17/2026
Docket Number: 23-SB-02*

Draft Transportation Fuels Transition Plan

Additional submitted attachment is included below.

June 15, 2026

California Energy Commission
Docket Unit, MS-4
Docket No. 23-SB-02 and 25-PIIRA-01
715 P Street Sacramento, California 95814

Re: Draft Transportation Fuels Transition Plan

Dear Commissioners:

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 submit this comment in response to the *Draft Transportation Fuels Transition Plan*. The draft plan is focused on transportation fuels, petroleum dependence, and the state's transition strategy, yet omits any meaningful discussion of maritime fuels.

This omission is significant and represents a material defect in the Draft Plan that needs to be remedied. Maritime fuels are an important part of California's broader petroleum and energy ecosystem. The movement of people and goods on water is unequivocally transportation and ocean-going vessels consume hundreds of millions barrels of fuel annually in California waters. In addition to the significance of conventional fuel demands, there are the impacts of ongoing local, state, and international efforts to address the emission profile of ocean-going vessels which are creating broad opportunities related to the demand, production, and distribution of alternative maritime fuels, which also align with the challenges of petroleum transition that need to be addressed in this Draft Plan.

For all these reasons, any document that purports to comprehensively and accurately assess the transition away from petroleum fuels for transportation must acknowledge and address maritime fuels.

As a result of this omission, the assessment presents an incomplete picture of California's fuel transition challenges, opportunities, and needed next steps. The exclusion of maritime in this document is especially confounding given that aviation and sustainable jet fuels *are* included in this draft plan, indicating that this Draft Plan is intended to address more than just domestic, intrastate, or on-road vehicle energy needs.

We respectfully urge the Commission to revise the Draft Plan to specifically include maritime fuels in any statewide planning efforts related to transportation fuels and the transition to alternative maritime fuels. PMSA's member companies are already investing billions of dollars in new vessels that are capable of utilizing alternative maritime fuels and many of these ships are already calling on California ports.

If the State of California intends to be a leader in clean fuels and decarbonization of the transportation sector, then it must embrace the opportunity to comprehensively discuss a transportation fuels transition. The role of maritime is not a remote, future concept but is a current reality and global imperative fully embraced by the maritime industry at an international level through our members' ongoing commitments to the International Maritime Organization MEPC process. The preparation of the state for this future is already deficient, and PMSA has already received broad support from the California State Legislature to direct this Commission to begin to explore and plan for exactly how we will remedy these deficiencies via SB 298.

In short, the State's planning efforts to transition transportation fuels away from petroleum are not aligned with current global realities with respect to maritime fuels. For it to be complete, the Draft Plan should be revised to include these important considerations to support the maritime industry.

Respectfully submitted,



Jennifer Cohen
Vice President