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19-ERDD-01 and Research Idea Exchange

Comment Attached in PDF

Additional submitted attachment is included below.

The Port OF Hueneme
Oxnard Harbor District

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California Energy Commission
Docket Unit, MS-4
Re: Docket No. 19-ERDD-01
1516 Ninth Street
Sacramento, CA 95814-5512

January 9, 2020

Dear California Energy Commission Staff,

With these brief comments, the Port of Hueneme (Port) seeks to provide input on the proposed grant funding opportunity (GFO) from the Energy Commission's Electric Program Investment Charge (EPIC) for distributed energy resources (DER) seeking to enable faster and more effective deployment of medium and heavy duty battery electric vehicles (BEV). The Port very much appreciates this opportunity to provide feedback to the State related to this GFO and how it could be an excellent match to assist in its ongoing pursuit of greater energy resiliency and in achieving zero emission operations at the Port enabled by a transition to decarbonized fuel use.

The Port is committed to embracing a future of cleaner cargo movement, and has been planning for this future for several years. Currently, the Port is implementing a number of projects which play a role in this future like our shoreside power system which enables our fresh produce container ships to plug in to electrical power at-berth instead of operating auxiliary engines burning fossil fuels. In addition, the Port is preparing for the installation of electrical infrastructure that will provide a power source for fueling future electric zero and near-zero emission cargo handling equipment, including multiple mobile harbor cranes, port trucks and container stackers/handlers. This current project includes the purchase two new fully electric yard tractors in 2020, which be the first heavy duty zero emission cargo handling equipment on Port. Engineering plans are also being finalized to install additional electrical power infrastructure to power electric mobile harbor cranes as well. Both of these are a result of a $3 million ZANZEFF grant awarded to the Port in 2018. The Port is matching the grant with $700,000 of it's own investment. In detail, this immediate infrastructure will include six in wharf electrical crane vaults being fed by a 4160 volt service, powering a series of 480 volt plugs. The electric Port trucks will also be powered by another set of 480 volt plugs in another area of the Port. As this transition to ZE equipment gathers momentum, these types of infrastructure modifications will be needed around the Port to provide fueling infrastructure for the next generation of cargo handling equipment. And, as we are in the planning phases for this change, it is the optimal time to incorporate planning around DER such as that funded by this GFO.

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This momentous investment by the Port is in support of the Executive Orders signed by Governor Brown B-55-18 and B-32-15 to have the State's Ports reach carbon neutral status by 2045. In addition to the current shoreside power system, which was a $14 million investment for the Port in 2014-15, the Port is beginning early phases of planning and engineering for the installation and operation of an additional emission control technology. This alternative control technology will be installed to control emissions from ocean going vessel categories not currently covered by the California Air Resources Board's (CARB) current At Berth regulations. This system, although not yet currently commercially available or CARB approved, will likely be required to be in operation by 2023 per CARB's most recent proposed rule change at their December 5th, 2019 Board meeting. The systems most similar to what will be needed at the Port currently operate on diesel fuel and do not capture carbon emissions from the filtration systems cleaning the vessel exhaust gases. Therefore, it is likely that the Port's system will be required to operate in a ZE mode and electrical power would be a likely fuel source for this important system. The required load for this technology is not yet known, however could be significant. Therefore, this type of additional power demand is likely to run into the ceiling problem the Port is facing and alternate power solutions need to be assessed. Despite this initial positive progress, challenges remain that will have to be overcome in order to get to a ZE future.

Currently, the Port's most significant hurdle is the quantity of available electrical power it can receive from its utility provider, Southern California Edison. The Port is very near to the ceiling of its maximum available power supply and any increase in electrical load demand (which may be substantial given our ZE plans) will require a significant regional upgrade in power supply. This upgrade could take three to five years to complete and cost in the many tens of millions of dollars. CEC's GFO could assist the Port in continuing our pursuit of ZE adoption for our medium and heavy duty equipment while avoiding the bottleneck of our utility provided power constraints. DERs would play a pivotal role in helping manage demand, both current and future, and enable more efficient management of electrical loads and charging optimization.

DER's would also be complimentary to the Port's efforts to increase Port energy resiliency and reliability. The region around the Port has suffered extreme wildfires in the last several years and on multiple occasions, the Port has lost power and been reliant on backup generators for lengthy periods of time. The Port's security requirements are strict and, along with worker safety, are some of the most important tasks for the Port to undertake. It is evident how critical the resiliency of the Port's power systems will be in future emergencies. As the local community organizes in preparation for future disasters, the Port's role will only be strengthened by having a solid foundation of electrical power reliability with which to serve the community as a response hub.

We encourage the CEC to prioritize projects at California's public Ports, like the Port of Hueneme, in the project selection process for the EPIC DER awards. Many of California's Ports are located in or adjacent to disadvantage communities and federally designated Opportunity Zones. Both of which make funding projects at these public seaports most advantageous to public health benefits and attracting additional private funding for public-private partnerships in the future adoption of these new technologies.

Sincerely,

Cam Spencer
Public & Government Relations Manager
The Port of Hueneme

Giles Pettifor
Environmental Manager
The Port of Hueneme