

**DOCKETED**

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**Pacific Environment Comments on 2023-2024 Investment Plan  
Update for the Clean Transportation Program**

*Additional submitted attachment is included below.*



November 28, 2023

California Energy Commission  
Docket No. 23-ALT-01  
715 P Street  
Sacramento, CA 95814

**RE: Clean Transportation Program's 2023-2024 Investment Plan Update – Need for Shore Power and Green Hydrogen Infrastructure at Ports**

To Whom it May Concern:

Pacific Environment appreciates the opportunity to submit comments on the California Energy Commission's (CEC) Revised Staff Draft Report 2023-2024 Investment Plan Update for the Clean Transportation Program.

Pacific Environment is an environmental non-profit headquartered in San Francisco dedicated to protecting communities and the environment around the Pacific Rim. We work to get ships off fossil fuels and have consultative status at the International Maritime Organization, the United Nations entity that sets global shipping laws.

We urge CEC to prioritize funding for shore power and green hydrogen fuel infrastructure at ports. Ships are one of the worst air polluters in California, contributing a large portion of health and cancer risk to communities near ports. This pollution disproportionately affects lower-income communities and communities of color. Moreover, the U.S. Environmental Protection Agency just approved California's authorization request for the 2020 At Berth Rule, and we need the CEC to invest in port decarbonization technologies more than ever to support compliance with this rule. Currently the Investment Plan Update allocates funding for emerging opportunities in 2025-2026 and port ZEV infrastructure in 2026-2027, but funding for these categories is needed much sooner to accelerate the zero-emission transition for the maritime sector. We'll also be urging the legislature to do the same.

It is our understanding from ports, utilities, and industry that the delay in the development of shore power infrastructure stems from the utilities not being able to develop the infrastructure capacity needed to meet the 2030 compliance timeline for the At Berth Rule. In other words, they can't fit the additional infrastructure development into their existing infrastructure development pipeline without additional resources/allocated funding.

At the Port of Hueneme, for example, the forecasted cost for electric infrastructure is \$28.5 million, which does not include the local utility company's infrastructure improvements. Those necessary upgrades are forecasted to cost as much as \$50 million.

The Port of San Francisco studied the power requirements specific to powering cruise ships and found it could cost around \$80-100 million to fully fund service connection infrastructure.



To protect the ocean, climate, and public health and livelihoods, California cannot afford to delay the shipping industry's transition to a clean energy future. We need CEC to prioritize funding for port electrification and green hydrogen infrastructure in order to achieve greenhouse gas emission reduction targets, urgently save lives, meet bare minimum federal clean air attainment standards, and align our decarbonization trajectory with the Paris Climate Agreements' 1.5C global warming mitigation target.

Thank you for your consideration of these comments. We would be pleased to answer any questions or provide further information.

Sincerely,

A handwritten signature in black ink that reads "Jayne Stevenson".

Jayne Stevenson  
Climate Policy Associate  
Pacific Environment