

DOCKETED

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Curtin Comment to Docket 19-TRAN-02

Additional submitted attachment is included below.

July 30, 2024

Ms. Michelle Vater
Supervisor, Freight and Transit Unit
California Energy Commission
715 P Street
Sacramento, CA 95814

Dear Ms. Vater:

On behalf of Curtin Maritime Corporation (“Curtin”), thank you for the opportunity to provide comments regarding Docket #19-TRAN-02 (Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure). As a Southern California marine solutions company, Curtin is a leading proponent of low- and zero-emission marine service alternatives. Curtin is excited by the opportunity to leverage valuable programs like this to help innovate clean technology solutions for the benefit of the environment and, most importantly, California citizens.

Founded in 1997 by Captain Martin Curtin Jr., Curtin Maritime Company is a full-service marine solutions provider engaged in dredging, ocean towing, marine construction, project cargo, and offshore oil and gas support and salvage services. Curtin prioritizes environmental sustainability and seeks to exceed regulatory minimums in reducing harmful air emissions. By combining operational excellence, an abiding commitment to safety, and an forward-thinking approach to our environmental responsibility, Curtin meets the needs of demanding public and private sector customers including the U.S. Army Corps of Engineers, the Port of Houston, U.S. Navy, U.S. Fish & Wildlife Service, the Port of Long Beach, Chevron, Global Diving & Salvage, Space X, Exxon/Mobil, the City of San Diego, the City of San Francisco, and many more.

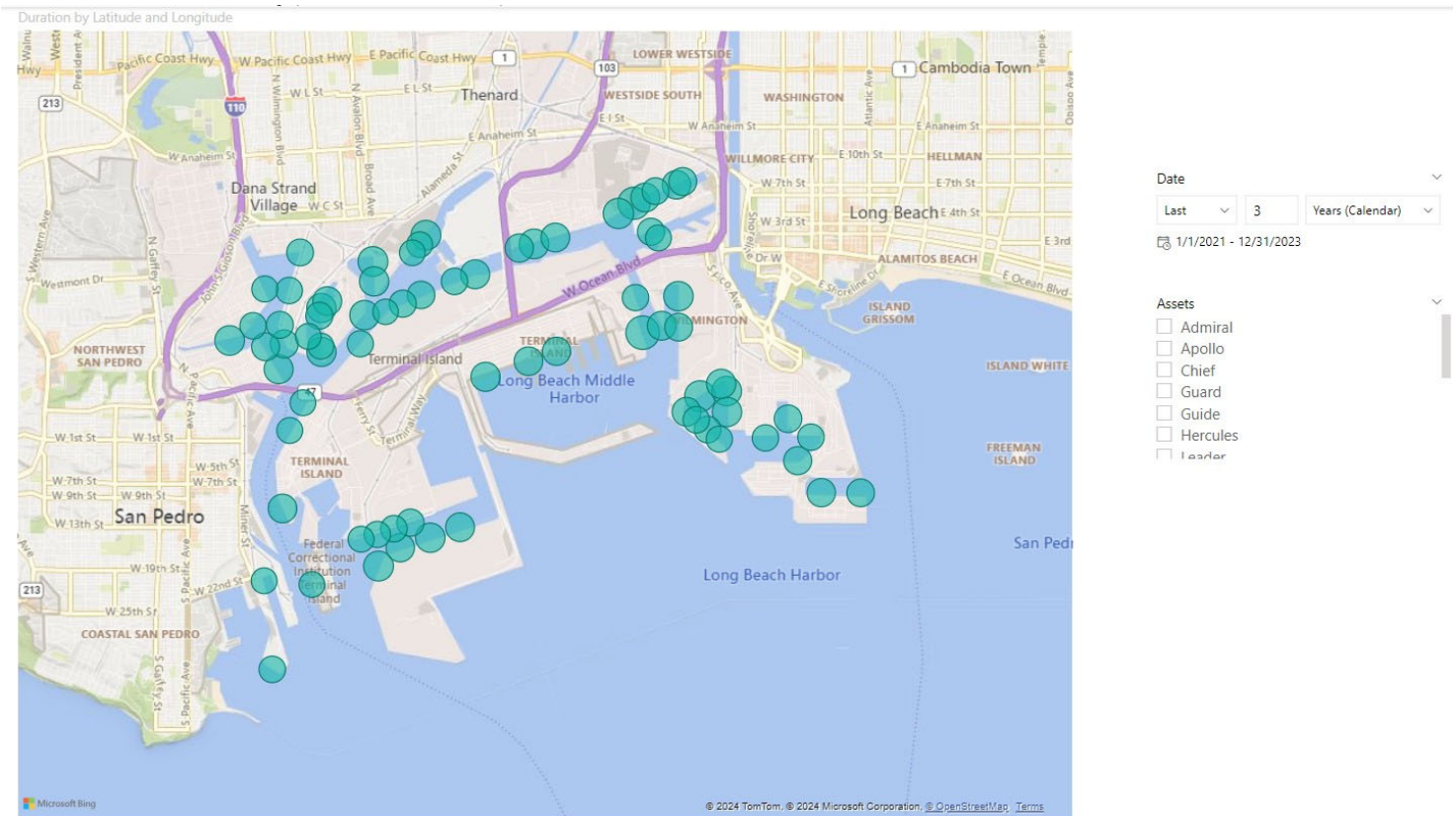
Curtin comments address Concept 4 of the MDHD ZEV which provides up to \$40 million for charging or refueling infrastructure funds for California ports; with a focus on building out grid capacity and onsite energy generation to power the ZEV infrastructure in the timeframe aligned with California port zero-emission goals.

It is vital that this infrastructure consider the urgent needs of vessels calling California ports. While it is important that charging and hydrogen fueling facilities support current and future deployment of zero-emission land-based vehicles and/or off-road equipment, this concept should expressly contemplate the significant emissions profile of commercial vessels working in ports throughout California.

For this reason, it would not be practical to incentivize marine-focused charging or refueling facilities based on the number of chargers deployed. A more valuable metric for vessel charging or fueling infrastructure would focus on ensuring a high utilization rate for the infrastructure and a high number kilowatt-hours provided the infrastructure – i.e. does the infrastructure provide sufficient charging capacity to eliminate the need for vessels using traditional internal combustion engines. **Curtin believes that the CEC should expressly fund charging and fueling solutions that enable vessel operators to confidently transition to zero-emission vessels and know that their ZE vessels can fully utilize the infrastructure in a convenient, efficient, and cost-effective way.** Concept 4 as currently proposed appears to primarily assist the deployment of infrastructure for shore-based vehicles and equipment.

If the program incorporates special practical considerations for vessel operators, this will be a very useful program to spur the adoption of electric and hydrogen powered vessels. California cannot achieve its air quality goals without widespread adoption of zero-emission (ZE) commercial vessels. One important factor inhibiting the adoption of ZE vessels is the limited availability of shoreside charging and fueling infrastructure. The availability of shore-side land along with permitting and regulatory challenges has so far constrained the feasibility of shoreside vessel charging infrastructure. **We believe that this initiative could significantly advance the current state of the art by providing funding for mobile charging solutions that are barge-based.**

Several factors argue in favor of supporting mobile floating charging and fueling infrastructure. Mobile stations can move to where vessels can most efficiently utilize them. The below graphic demonstrates the distribution of towing vessels throughout the port complex of LA/Long Beach, with turquoise dots showing a widely dispersed fleet that could benefit from mobile charging:



Shore-based charging infrastructure needs specific, dedicated land along with utility tie-in infrastructure that can pose logistic or regulatory challenges to deploy. Additionally, port facilities are dynamic operating environments where different customer needs require shifting land resources. A terminal that serves one purpose at one time may not serve that same purpose in several years. A mobile solution allows the charging platform to transit to where vessels need the services – and frees up valuable port land for other economically beneficial use. Mobile charging platforms are also highly scalable to accommodate an increase in demand or a change in port needs.

Curtin is very grateful that CEC has solicited comments on this important program. We believe that, as maritime operators and a Port of Long Beach tenant, we can play an important part in driving down and even eliminating harmful vessel emissions and leveraging clean technologies to decarbonize our ports.

Please feel free to reach out to us with any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charles Costanzo'.

Charles Costanzo
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