

DOCKETED

Docket Number:	22-ALT-01
Project Title:	2022-2023 Investment Plan Update for the Clean Transportation Program
TN #:	246804
Document Title:	The Pasha Group Comments on CEC CTP Investment Plan
Description:	N/A
Filer:	System
Organization:	The Pasha Group
Submitter Role:	Public
Submission Date:	10/25/2022 3:58:59 PM
Docketed Date:	10/25/2022

Comment Received From: The Pasha Group
Submitted On: 10/25/2022
Docket Number: 22-ALT-01

The Pasha Group Comments on CEC CTP Investment Plan

See attached letter.

Additional submitted attachment is included below.



THE PASHA GROUP

GLOBAL HEADQUARTERS
4040 CIVIC CENTER DRIVE, SUITE 350, SAN RAFAEL, CA 94903
TELEPHONE: (415) 927-6400 FACSIMILE: (415) 924-5672

WORLDWIDE
INTEGRATED
TRANSPORTATION
& LOGISTICS
SERVICES

October 25, 2022

California Energy Commission
715 P Street
Sacramento, CA 95815

RE: FY 2022-2023 California Energy Commission (CEC) Investment Plan Update for the Clean Transportation Program

Dear Commissioner Monahan and CEC Staff,

The Pasha Group appreciates the opportunity to provide input on CEC's proposed FY 2022-23 Clean Transportation Program Investment Plan Update and support proposed investments for emerging opportunities, including marine and off-road goods movement.

The Pasha Group, a family-owned, third-generation company, is proud to have over 1,200 team members across California, with our corporate headquarters in San Rafael, and terminal operations at the Ports of San Francisco, Oakland, Long Beach, Los Angeles, and San Diego. As a diversified global logistics and transportation company, our California facilities support critical West Coast shipping hubs to connect individuals and businesses to the world.

As part of our ongoing infrastructure and vessel investment plan for our California/Hawaii maritime services, we proudly welcomed the first of two new 'Ohana Class containerships, *MV George III* into service on August 17, 2022.

George III is the first Liquefied Natural Gas (LNG) powered vessel to fuel on the West Coast and the first to serve the West Coast/Hawaii trade lane. The new 774-foot Jones Act (US built, US flagged, and US crewed) vessel surpasses the International Maritime Organization (IMO) 2030 emission standards for ocean vessels with close to zero sulfur emissions, a 99.9% reduction in particulate matter, a 90% reduction in nitrogen oxide and 25% reduced carbon dioxide as compared to liquid oil fuels.

We will soon welcome our second 'Ohana Class vessel, *MV Janet Marie*. She will also operate on LNG from day one and mirror *George III* in size and design. In addition, our containership *Horizon Reliance* is currently being retrofitted to operate on LNG and is expected to re-enter service in the first quarter 2023.

The Pasha Group is a proven leader in deploying innovative technologies in California to reduce emissions in the marine and goods movement sector. We strongly support the proposed investments outlined within the draft Clean Transportation Program Investment Plan, specifically the proposed multi-year allocations for emerging opportunities and medium- and heavy-duty vehicles. Along with the investments being made by the Air Resources Board to support vessel and vehicle deployment, this funding will be necessary to provide the infrastructure needed to

support successful deployments and commercialization of zero-emission marine and goods movement technologies.

As noted in the Investment plan, “reducing air pollution is important to improve equitable outcomes, given that air quality burdens fall disproportionately on low-income residents and people of color.” The CARB proposed demonstration project “Emission Reductions From Oceangoing Vessels” will help to reduce emissions criteria pollutants in port terminal communities. The Clean Transportation Program Investment Plan should provide support for the improvement of ship infrastructure and the electrical grid for port terminals to enable more oceangoing vessels to use shore power to reduce harmful emissions, support demonstration projects on oceangoing vessels and port terminals to reduce emissions and support the development of infrastructure to deliver cleaner fuels for oceangoing vessels (LNG and hydrogen).

The Pasha Group appreciates the opportunity to support and provide input on CEC’s proposed Clean Transportation Investment Plan update for FY 2022-2023. We look forward to continuing to work with the CEC and other stakeholders to accelerate the transition to zero-emission technology and reduce emissions from the marine and goods movement sectors.

Best regards,

A handwritten signature in black ink that reads "George Pasha". The signature is fluid and cursive, with a long horizontal stroke at the end.

George Pasha, IV
President & CEO

CC:

Sarah Lim, Advisor
Hannon Rasool, Deputy Director
Melanie Vail, Assistant Deputy Director
Patrick Brecht, Energy Commission Specialist