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ACEEE Replacement Tire Efficiency Standard Comments

Additional submitted attachment is included below.

American Council for an Energy-Efficient Economy

June 9, 2026

California Energy Commission
Docket Unit
715 P Street, MS-4
Sacramento, CA 95814

RE: Docket No. 26-TIRE-01: Replacement Tire Efficiency Program

Dear Commission Staff:

This letter constitutes the comments of the American Council for an Energy-Efficient Economy (ACEEE) on the California Energy Commission (CEC) notice of proposed action (NOPA) for the replacement tire efficiency program. We appreciate the opportunity to provide input to the Commission.

ACEEE strongly supports the Commission's NOPA for replacement tires, which is a win for consumers and for cleaner air. At a time when many households are struggling with high costs, especially for gasoline, the proposed standard would deliver millions of dollars in needed fuel savings. CEC staff estimate that the standard would save California drivers an average of $179 to $246 in fuel costs over the lifetime of a tire set, but these figures would be even higher with today's fuel prices. This equates to almost $1 billion in annual savings by 2035. The standard would also contribute to better local air quality in the state and reduced greenhouse gas emissions, the equivalent to taking 400,000 gasoline vehicles off the road (CEC 2026).

ACEEE welcomes the updates to the proposal and the inclusion of additional elements, including a wet grip standard to ensure safety. This standard is supported by a rigorous analysis of real-world data and the Commission has provided a thorough assessment of impacts. We therefore urge the Commission to promptly finalize this rulemaking.

The proposal delivers needed fuel savings for California drivers

By Phase 2 of the standard, CEC staff estimate that California drivers will save an average of $179 to $246 in fuel costs over the lifetime of a tire set and the increased cost of that tire set will only be $26 to $39, depending on the weight of the vehicle. This would translate to a payback period of just 7 to 8 months, well within the expected 4-year lifetime of a set of tires. These savings figures are also based on a December 2023 gasoline price estimate of $4.60, but current prices in the state are averaging over $6.00, further increasing the savings and reducing the payback period (AAA 2026; CEC 2026). Low-income households and households of color spend a disproportionate amount of their income on gasoline and would greatly benefit from this proposal. Those earning less than 200% of the federal poverty level can pay upwards of 14% of their income on gasoline, double what middle-income households pay. These households are also much less likely to buy new vehicles and therefore are more likely to be driving a vehicle with relatively inefficient replacement tires (Vaidyanathan et al. 2021).

The proposal would save money while maintaining tire safety and lifetime

The proposal includes a wet grip standard that ensures a minimum safety standard for replacement tires. Testing undertaken as part of the rulemaking confirmed that there is no relationship between wet grip and rolling resistance ratings. Tires of higher rolling resistance, which will be required by the standard, are as safe on average as tires falling below the new rolling resistance standard. There are many high rolling resistance, high wet grip tires for drivers to choose from. Among the tires examined, the 8 that do not meet the new wet grip standard are relatively inefficient and would not meet the Phase 2 rolling resistance standard (CEC 2026). The proposal could also potentially improve tire lifetimes. According to Consumer Reports, of the 51 all-season tires tested by the company, tires with a rolling resistance score of 4 or 5 out of 5 had longer tread lifetimes than those with a score of 3 or below (Consumer Reports 2026).

Electric vehicle owners also benefit from this standard

Improving the efficiency of electric vehicles (EVs) through more efficient replacement tires is very important, even with their lower fuel costs and lack of tailpipe emissions. Greater EV efficiency leads to greater range as it allows a vehicle to drive further on the same charge. Range is highly valued by EV drivers and thus an affordable way to increase range provides considerable benefits to the growing number of EV drivers in the state (Turner 2025). Higher efficiency also means less electricity demand from EVs overall, and that reduces the strain on the electricity grid. Less demand on the grid reduces the need for new upgrades to the distribution and transmission system, and saves money for ratepayers in the long term (Huether 2024).

ACEEE urges the commission to finalize this rulemaking

The proposed replacement tire standard will deliver fuel savings for California drivers at a time of high gasoline costs and high costs of living. The improvements in rolling resistance pay for themselves in months due to the significant fuel savings. We support the Commission's inclusion of a wet grip standard to ensure safety and believe that CEC staff have done their due diligence in crafting this proposal. We urge the Commission to promptly finalize this rulemaking.

References

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Turner, Nick. 2025. “2025 EV Driver Annual Survey Report.” Plug-In America, June. https://pluginamerica.org/wp-content/uploads/2025/06/2025-EV-Driver-Annual-Survey-Report.pdf.

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