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20225 North Scottsdale Road · Scottsdale, Arizona 85255 · (480) 606-6000

Hello Commissioners, my name is John Baldwin from America's Tire, also known as Discount Tire. We operate 151 stores across California, and I appreciate the opportunity to speak today.

I want to start by thanking the Commission for its collaborative approach in developing this proposal. We truly appreciate the Commission's engagement with retailers and its willingness to incorporate real-world data into the rulemaking. Seeing real-world tire mileage and safety data from our Treadwell program reflected in the proposal—particularly in shaping the long-life tire category—gives us confidence that this program is grounded in how tires actually perform for California drivers. That kind of data-driven collaboration strengthens the foundation of this program.

We support California's energy efficiency and emissions-reduction goals, and we commend the Commission for the significant improvements made since earlier drafts. The extended phase-in timeline provides a realistic path to compliance. The tiered structure appropriately recognizes that different tire categories face different design constraints. The addition of a minimum wet traction requirement reinforces that safety remains a priority. And the streamlined compliance approach—without point-of-sale labeling requirements—reduces unnecessary operational burden while still ensuring accountability.

While we're optimistic and broadly supportive, our support for this program remains conditional on sustained attention to consumer cost and product availability. Critical to the success of this program is the understanding that tires are a non-discretionary purchase—drivers cannot opt out. If highly efficient tires carry significant price premiums or meaningfully narrow the available selection, the burden will fall disproportionately on cost-sensitive consumers. As one practical illustration, if the Phase 2 requirements beginning in 2031 were applied to the tires we sell in California today, roughly 70 percent of currently available options would be removed from the market. These are addressable challenges, assuming the Commission maintains active engagement with retailers and manufacturers throughout implementation and is willing to adjust the program requirements, if real-world market and performance data indicate that consumer cost or product availability will be unreasonably compromised. America's Tire is committed to supporting the Commission through periodic check-ins and data sharing over the coming years to help ensure the program stays on track and delivers its intended benefits.

In closing, we appreciate the Commission's willingness to work with stakeholders and embrace real-world data to improve this proposal. We look forward to continuing to partner with you to ensure this program delivers meaningful efficiency gains while preserving safety, affordability, and consumer choice for California drivers. Thank you for your time and consideration.