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**ACEEE Replacement Tire Efficiency Standard 15-Day Language
Comments**

Additional submitted attachment is included below.

American Council for an Energy-Efficient Economy

August 3, 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 “15-day language” for the replacement tire efficiency program. We appreciate the opportunity to provide input to the Commission.

We strongly support the Commission’s efforts to establish replacement tire efficiency standards to deliver much needed fuel cost savings to California drivers. Once the standard is enacted, we urge the commission to develop a standard for all-season winter performance tires and monitor the 15,000 unit limited production exemption to ensure maximum benefit from the standard going forward.

We urge the Commission to establish the replacement tire efficiency standards

These standards will deliver major fuel cost savings to drivers at a time when it is most needed. CEC staff estimate that the original 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. We urge a prompt adoption of these standards to provide fuel cost benefits while improving air quality and lowering greenhouse gas emissions.

We urge the Commission to adopt a resolution to establish future standards for all-season winter performance tires

The amended language exempts all-season winter performance tires from the rolling resistance and wet grip standards given a current lack of data to set an appropriate standard. However, this is a rapidly growing segment of the tire market and should be included in the future in this standard to maximize overall fuel savings. We urge the Commission to collect the data necessary to evaluate and adopt a standard for all-season winter tires in a future rulemaking. Data collection during Phase 1 of this standard offers an opportunity to help address any remaining questions regarding all-season winter tires.

The commission should carefully monitor the 15,000 unit limited-production exemption to ensure appropriate usage

The exemption provides flexibility within the rule for small production and specialty tires but may also be taken advantage to limit the impact of the rule. We encourage the Commission to carefully monitor the usage of this exemption and enforce the standard when necessary to ensure all high-production tire lines are included in the standard. Cases where the total production of functionally equivalent tire lines

exceeds 15,000 but that production may be split across plants, brand names, or SKUs is of particular concern. Strong oversight and enforcement can ensure only genuinely limited-production tire lines are given the exemption and the maximum benefits from the standard are realized by California drivers.

Replacement tire efficiency standards deliver much needed fuel savings to California drivers

This standard will save California drivers hundreds in fuel costs at a time when they most need relief from the current high cost of living. The fuel savings will also deliver air pollution and greenhouse gas emissions reductions, helping California meet its air quality and climate goals. We urge the Commission to promptly adopt these standards.

Sincerely,

Peter Huether
Senior Research Associate
American Council for an Energy-Efficient Economy