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Michelin comments on the Summary of Changes to the California Tire Efficiency Rulemaking

Additional submitted attachment is included below.

July 31, 2026

California Energy Commission
Docket No. 26-Tire-01
1516 Ninth Street, MS-4
Sacramento, CA 95814

Re: Notice of Additional Public Comment Period and Summary of Changes Replacement Tire Efficiency Program Rulemaking (Docket No. 26-TIRE-01; TN# 271526)

Michelin North America (Michelin) supports the California Energy Commission's (CEC) proposed regulations establishing rolling resistance thresholds for replacement tires and appreciates the improvements made to the express terms published on July 17, 2026.

This comment document supplements Michelin's earlier submission filed on June 16, 2026, under Docket No. 26-TIRE-01 (Comment Tracking No. 270632).

I. Introduction

Since its founding, Michelin has always upheld freedom of movement as a fundamental right and a source of human progress. Keenly aware of the environmental impact of its operations, Michelin Group (the #1 tire manufacturer globally in 2025) strives to maintain a leading role in sustainable development. The company's actions are grounded in its history, values, and expertise, and in the reaffirmation of its strong convictions.

Among these convictions is the belief that technological progress is one of the solutions to environmental challenges. Technological progress is critical for a society committed to making efficiency gains that help the environment. Michelin believes that technological progress enables us to continually build on the principles of the circular economy, carbon reduction, resource conservation and biodiversity. This conviction is deeply rooted in Michelin's culture, reflecting its innovation leadership and its expertise in the optimal use of materials and the development of products that are made to last.

In this context, Michelin has been committed for many decades to improving the rolling resistance of its products. From 1992 to 2025, Michelin halved its tires' rolling resistance and aims to improve that performance by 1% per year through 2030.

Michelin offers comments on the following key points, which are discussed in greater detail below:

- Michelin supports the following changes published on July 17
    - The updated timing of 2029 and 2033 with the associated thresholds for rolling resistance
    - Exempting winter-type snow tires is important to ensure sufficient tire performance is feasible in certain driving conditions. Michelin supports the clarification & exemption of 3PMSF tires
    - UTQG treadwear limits of 800 & 1000 for long life and ultra-long life.
    - Clarification of commercial vehicle tires
    - CEC accepted industry feedback for utilizing ISO 15222 for wet grip testing of LT & commercial tires. The threshold of 1.0 is appropriate.
    - UTQG treadwear testing of LT & commercial tires proposed in the express terms. Michelin recommends more investigation with additional data to ensure the regulation has appropriate test conditions and thresholds.
- Michelin would like to work with the CEC to exempt collector cars under Vehicle Code § 259 from the tire efficiency regulation while ensuring appropriate enforcement is feasible.
- Enforcement: Compliance enforcement is essential to meet the CEC's energy saving targets.

II. Michelin Responses to Requests for Comments

§3302. Definitions

§3302. Definitions (11)

(11) "Competition tire" means a tire designed for motorsports usage and intended by manufacturers to be fitted to vehicles involved in motorsport competition and

(A) has a tread depth of 8/32 of an inch or less; and
(B) has a speed rating of W, Y, or (Y); and
(C) does not have a UTQG treadwear rating of greater than 200; and
(D) is not classified as an all-season in manufacturer labeling or original equipment fitment programs.

Michelin Comment: In §3302. Definitions (11) (D), Michelin recommends changing to "is not marked with "M+S", "M.S.", "M&S", "M-S", or "M/S"." This is easier to validate by inspecting the tire and aligned with USTMA Tire Information Service Bulletin volume 10 regarding USTMA Snow tire definition for passenger and light truck tires.

§3302. Definitions (24)

(24) "Large off-road tire" means a tire with a speed rating of up to and including Q and not to exceed 99 miles per hour and a minimum diameter of 34.5 inches or more as measured as the longest distance between two outside edges of the tire on the same side.

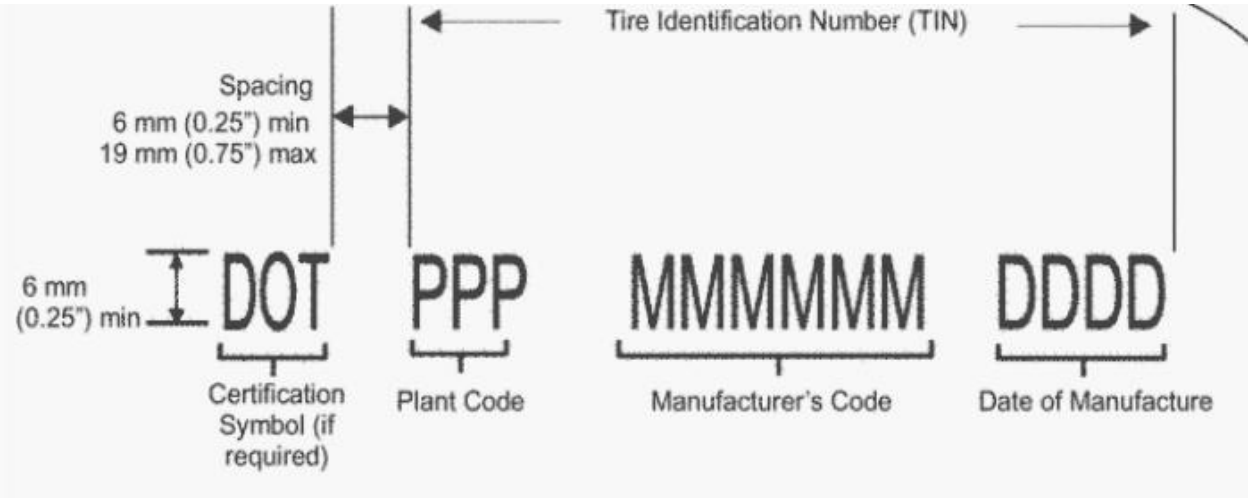
Michelin Comment: In §3302. Definitions (24), Michelin recommends changing the measurement method to "The outside diameter of the inflated tire is determined by measuring the maximum circumference of the tire along the tread centerline, and dividing this dimension by π (3.14). The inflation pressure shall follow 49 Code of Federal Regulations part 571.119 or 571.139 as applicable." This is the industry standard methodology and should be well correlated to the proposed direct measurement of diameter.

§3302. Definitions (46)

(46) "Replacement tire" means a new tire sold or offered for sale in California, except as wholesale for final retail sale outside the state, and is designed to replace a tire on a passenger car or light-duty truck. "Replacement tire" does not include any of the following tires:

(A) a retreaded tire;
(B) a used tire;
(C) a deep tread tire;
(D) a winter-type snow tire;
(E) a space-saver tire;
(F) a temporary use spare tire;
(G) a tire with a nominal rim diameter of 13 inches or less;
(H) a motorcycle tire;
(I) a tire manufactured specifically for use on an off-road motorized recreational vehicle;
(J) a limited production tire;
(K) a tire with a load index of 122 or greater, or where the load index is not marked and the tire is rated for a maximum load that exceeds 1,450 kg; or
(L) a tire that is not capable of maintaining sustained speeds of greater than 50 miles per hour.;
(M) a competition tire;
(N) a large off-road tire; or
(O) any tire that the manufacturer has not labeled with a tire identification number pursuant to 49 Code of Federal Regulations part 574.5(a)(1) (October 1, 2024).

Michelin Comment: In §3302. Definitions (46) (O), Michelin recommends changing to "any tire without the DOT symbol". The DOT symbol certifies tires meet FMVSS requirements, because the TIN is often used on non-DOT tires.



§3303. Test Specifications

§3303. Test Specifications (f) (1)

(1) If Table 1, as referenced by 49 Code of Federal Regulations part 575.104(e)(2)(ii) (2024), does not specify a treadwear test inflation pressure applicable to the replacement tire, then the test inflation pressure for the replacement tire shall be 84 percent of the maximum pressure specified on the tire's sidewall as corresponding to its maximum rated single-tire load. Otherwise, use the applicable treadwear test inflation pressure as specified in 49 Code of Federal Regulations part 575.104(e)(2)(ii) (2024).

Michelin Comment: In §3303. Test Specifications (f) (1), Michelin recommends changing the underlined sentence above to "then the test inflation pressure for the replacement tire shall be 80% of the pressure corresponding to the maximum single tire load-carrying capacity." The maximum pressure on the sidewall of the tire may not always correspond to the nominal pressure used when calculating the load carrying capacity of a tire.

§3303. Test Specifications (f) (2)

(2) If 49 Code of Federal Regulations part 575.104(h) (2024) does not specify a test-load multiplier applicable to the replacement tire, then determine the replacement tire's test load as follows: (a) multiply 0.866 by the tire's maximum load rating, (b) round the number obtained in subsection (a) of this section to the nearest multiple of ten pounds, or, if metric units are used, 5 kilograms, and (c) use the test load calculated in subsection (b) of this section as the test load for 49 Code of Federal Regulations part 575.104(e)(2)(iii) (2024). Otherwise, use the applicable test load determination procedure described in 49 Code of Federal Regulations part 575.104(h) (2024).

Michelin Comment: In §3303. Test Specifications (f) (2), Michelin recommends adding the following statement: 49 Code of Federal Regulations part 575.104(e)(2)(iii) (2024) states "Load each vehicle so that the load on each course monitoring and candidate tire is 85 percent of the test load. (load on each candidate tire = 0.866 * 0.850 * tire's max load)"

§3305. Submitting Tire Information to the Database

§3305. Submitting Tire Information to the Database (b) (6) (F)

(F) The tread depth in 1/32 of an inch measured from the bottom of the groove.

Michelin Comment: In §3305. Submitting Tire Information to the Database (b) (6) (F), Michelin recommends reporting tread depth to the nearest 0.5 of 32nds of an inch which better reflects manufacturer specifications and measurement precision used in industry practice.

III. Conclusion

In conclusion, Michelin supports CEC's proposed express terms aimed at improving tire rolling resistance and overall energy efficiency, recognizing its alignment with long-term environmental and performance objectives. The improvements to the express terms published on July 17, 2026 were critical to ensure tires could be tested and to clarify the tire segments subject to the regulation. Michelin reiterates the importance of enforcement to ensure energy savings.
Michelin appreciates the opportunity to submit these comments.

Michelin recommends checking tire pressure monthly. More information can be found using the link below.
https://www.michelinman.com/auto/auto-tips-and-advice/tire-maintenance/routine-tire-care-tips

Sincerely,

Britton Swingle,
Director, Industry Standards & Government Regulations
Michelin North America, Inc.