

DOCKETED

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Pirelli Tire Comments on Changes to the Proposed Replacement Tire Efficiency Program

Additional submitted attachment is included below.



August 3, 2026

California Energy Commission
Docket Unit
Docket No. 26-TIRE-01
715 P Street
Sacramento, CA 95814

Re: Comments on the Summary of Changes to California Energy Commission's Proposed Tire Efficiency Regulation

Pirelli Tire LLC, which sells tires in California both manufactured in the United States and imported, appreciates the opportunity to provide additional comments on the California Energy Commission (CEC) proposed regulation to increase the efficiency of passenger car and light-truck replacement tires pursuant to Assembly Bill 844 (Nation, Chapter 645, Statutes of 2003), with proposed changes dated July 17, 2026.

Pirelli Tire LLC is part of the Pirelli Group, which leads the entire automotive industry in the S&P Global's 2025 Corporate Sustainability Assessment and is well on its way to decarbonizing its operations, and its tires, while making them more energy efficient.

As a reminder, Pirelli Group managers' incentive plans are linked to the volume of "eco-safety" tires placed on the market. We define "Eco-safety tires" as tires achieving an A or B rating in BOTH the rolling resistance and wet braking (safety) categories of the European label. We run our tires through this evaluation, regardless of whether they are sold in Europe and actually labelled this way. Our goal is for 50% of all the tire volume we sell worldwide to achieve this "eco-safety" status by 2030.

While we welcome the delayed implementation of the regulation, we must reiterate the importance of not exceeding the realm of possibility in terms of achievable rolling resistance levels without compromising the safety performance of tires sold in California. We reiterate that alignment with the European trajectory of rolling resistance improvement is the best path forward, with a timetable that is rigorous yet realistic.

The proposed Phase 2 rolling resistance thresholds are disproportionately stringent compared to other regulations worldwide and fail to take a holistic approach to tire performance. The thresholds are set at a level equivalent to the average rolling resistance of OE tires, which exceeds the California Energy Commission's stated objective of aligning replacement tire performance with OE tires.

In addition, the proposed implementation timeline is unrealistically aggressive and does not reflect typical tire product development cycles. For comparison, UN Regulation No. 117 tightened rolling resistance requirements for base tires by 3 N/kN over a 12-year period, whereas the proposed California regulation would impose a nearly equivalent



reduction of 2.9 N/kN in just four years. This accelerated approach creates significant compliance challenges without providing adequate time for product redesign, validation, and market transition.

When evaluating opportunities to reduce tire-related energy consumption, it is important to consider the principle of diminishing returns. The global tire industry has achieved significant reductions in rolling resistance over the years. However, as performance targets approach the practical limits of what is technically achievable, further reductions become increasingly difficult and may introduce unintended consequences.

A more effective approach to reducing tire-related energy consumption may be to improve compliance with recommended tire inflation pressures through education and enforcement. For example, operating a tire at 7 psi below the recommended pressure can increase fuel consumption by approximately 2.5%, while operating 14 psi below the recommended pressure can increase fuel consumption by as much as 15%. Ensuring proper tire inflation can therefore provide substantial and immediate energy savings.

It will also be of paramount importance to incorporate enforcement mechanisms into the regulation to avoid problematic non-compliance.

Further, we wanted to address the following technical points.

§3302. Definitions

(7) “Basic model” means all units of a given type of replacement tire (or class thereof) that are manufactured by one manufacturer and that share the same dimensions, rubber compounds, tread patterns, and energy consumption characteristics, or all units of a given limited production tire.

Pirelli comment: “Rubber compound” is not needed within the definition of basic model. A basic model of the tire is captured for the intent of this regulation by constraining dimensions, tread pattern and energy consumption characteristics. Including compounds would be difficult to enforce and unnecessary.

(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.

Pirelli comment: (11) (D) the phrase “or original equipment fitment programs” is not needed and may cause confusion.

(27) “Limited production tire” means all units of a tire that are manufactured by one manufacturer that share the same dimensions, rubber compounds, tread patterns, and energy consumption characteristics, calendar year of manufacture, and manufacture plant, that would qualify as a replacement tire but for the fact that the total production in the United States or importation into the United States by the tire’s manufacturer, or in the case of a tire marketed under a brand name, the total annual domestic purchase and purchase for importation into the United States by the tire’s brand name owner, will be less than 15,000 tires during the current calendar year

Pirelli comment: Point (27) presents two main issues:

- It may be difficult to estimate the 15k tire volume for the current year. It would be better to base the exclusion on an average of the previous year.
- This prescription may be unfair to USA producers with respect to foreign producers. Without robust enforcement, the unscrupulous may utilize this provision to bypass compliance.

(62) “Ultra high-performance” means a tire that both bears a speed category symbol of “W,” “(W),” “Y,” or “(Y)” and is capable of maintaining maximum speeds of 168 miles per hour or above, and that has a relative wet grip braking performance index of at least 1.45.

Pirelli comment: Point (62) the required wet grip braking performance index for ultra high performance tires is too demanding. Not all UHP tires are designed to have superior wet performance but rather some UHP tires focus on dry performance. The standard wet performance index of 1.0 satisfies all goals of the regulation even within the UHP cluster.

§3303. Testing Specifications

(2) (F) Maintains alignment pursuant to the following alignment procedure:

Pirelli comment: It is unclear if reference laboratories need to be compliant to this section. Defining the alignment procedure within the regulation may cause a double alignment requirement if they differ between European and Californian regulations. This could be resolved by simply referring to ISO 28580 and the European alignment procedure.

Additional note: the regulation cites ISO 28580:2018; please note that this will soon be reviewed and published as a 2026 version.



§3303. Testing Specifications

(b) Relative Wet Grip Braking Performance Index

Pirelli comment: The year date of both ASTM SRTTs (Passenger and Light Truck) should be removed in order to avoid the need to amend the regulation in the future.

(c) Load Index. The test method, procedures, and conditions to determine the load index of a replacement tire shall be ISO 10191:2021.

(d) Speed Rating. The test method, procedures, and conditions to determine the speed rating of a replacement tire shall be ISO 10191:2021.

Pirelli comment: ISO 10191:2021 is not applicable to light truck tires; the appropriate ISO standard to be used is the ISO 10454:2025 for Truck and bus tires — Verifying tire capabilities — Laboratory test methods.

§3303. Testing Specifications (f)

(f) UTQG Treadwear. Except as provided below, the test method, procedures, and conditions to determine the UTQG treadwear of a replacement tire shall be 49 Code of Federal Regulations part 575.104(e) (20243). For a light-truck or commercial replacement tire, the test method procedures to determine the UTQG treadwear shall be 49 Code of Federal Regulations part 575.104(e) with the following conditions:

Pirelli comment: The UTQG federal regulation does not pertain to LT tires so this prescription should be deleted and the info in the database should not be required.

§3304. Database of Replacement Tires and Limited Production Tires

Pirelli comment: It is not clear what information will be available at a public level. We support making the leaf ratings public but keeping the actual test values for RR and wet grip outside the public view. With the family certification approach, the database values may not be the actual performance values of a specific tire in the database and could cause confusion.

§3305. Submitting Tire Information to the Database

(b) (6) (C)

(C) The declared EU correlated rolling resistance coefficient shall be reported in newtons per kilonewton (N/kN) to the tenths place value. The reported value shall be no lower than the exact result of the EU correlated rolling resistance coefficient for the tire when tested according to the specifications in section 3303(a).

Pirelli comment: This requirement could be deleted since under point (b) (6) (C) there is already the indication to provide the tire energy efficiency rating, and the tire has to be compliant to the minimum requirements.



§3309. Compliance and Verification

(d) Testing of Replacement Tires by the Executive Director or Commission Staff.

(1) (B) If the mean EU correlated rolling resistance coefficient from the testing performed pursuant to subsection 3309(d)(1)(A) is more than two standard deviations greater than the information reported pursuant to section 3305(e)(5), then the Executive Director or commission staff shall proceed according to subsections (e) or (f), as applicable.

Pirelli comment: This is a solid improvement over the initial proposal. To strengthen it further, we would recommend aligning more closely with the UN/EU test tolerance requirement of +0.3 N/kN, which would help ensure consistency with established regulatory standards.

We look forward to actively engaging with CEC to achieve shared goals and are available to meet and discuss our perspective at your convenience.

Sincerely,

Maureen S. Kline

Maureen Kline
Vice President, Public Affairs & Sustainability
Pirelli Tire LLC