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ASAP Tire Standards 15-Day Language Comments

Please see attached comments from ASAP.

Additional submitted attachment is included below.

Appliance Standards Awareness Project

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 Appliance Standards Awareness Project (ASAP) 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.

While we strongly support the Commission’s efforts to establish replacement tire efficiency standards, we are disappointed by the proposed delays in the compliance dates and urge the Commission to implement the Phase 2 standards no later than 2032. In addition, we urge the Commission to commit to adopting future efficiency standards for all-season winter performance tires. Finally, the Commission should actively monitor the limited-production exemption to prevent potential compliance loopholes.

We urge the Commission to implement the Phase 2 standards no later than 2032. The Commission’s original proposal called for Phase 1 compliance in 2028 and Phase 2 compliance in 2031. We are disappointed by the proposed revisions pushing back the compliance dates for Phase 1 by a year (to 2029) and Phase 2 by two years (to 2033).¹ Delaying Phase 2 is particularly problematic because the Phase 2 standards will deliver the vast majority of the program’s benefits—generating most of the consumer fuel savings and statewide emissions reductions—while fulfilling the legislative mandate to ensure replacement tires are as efficient as original equipment tires. Every year of delay defers tangible economic benefits for California drivers and slows progress toward the state’s climate goals. A 2032 compliance date would still give manufacturers more than five years to redesign their products for Phase 2. For these reasons, we urge the Commission to adopt a Phase 2 compliance date of no later than 2032.

We urge the Commission to adopt a resolution to establish future standards for all-season winter performance tires. The Commission’s amended 15-day language would exempt all-season winter performance tires from the rolling resistance and wet grip standards, with the rationale being that these tires may not meet the wet grip standard.² While we understand the rationale for exempting these tires today, we are concerned that this exemption could undermine overall savings over time. All-season winter performance tires represent a rapidly growing market segment; these tires leverage advanced rubber compounds and tread designs to achieve strong snow traction without sacrificing year-round performance, and they avoid the severe rolling resistance trade-offs typical of dedicated winter tires. Failing to cover this expanding market segment risks leaving significant energy savings unrealized. The Commission should commit now to evaluating and adopting standards for all-season winter

¹ pp. 55-56. efiling.energy.ca.gov/GetDocument.aspx?tn=271526&DocumentContentId=109074

² p. 18. *Ibid.*

performance tires in a future rulemaking, informed by the rolling resistance and wet grip data that will be collected on these tires under Phase 1.

The Commission should closely monitor the 15,000 unit limited-production exemption to prevent loopholes. While the limited-production exemption is intended to provide flexibility for niche or specialty tire lines, we are concerned that this exemption provides a potential compliance loophole. We encourage the CEC to monitor for cases where a manufacturer's total production of a functionally equivalent tire line—across plants, brand names, or minor SKU variations—substantially exceeds the 15,000-unit threshold intended for genuinely limited-production tires. Strong, ongoing enforcement oversight will help ensure manufacturers cannot bypass the standards by fragmenting higher-volume products, safeguarding the expected benefits of the program.

Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script, reading "Jeremy Dunklin".

Jeremy Dunklin, PhD
Senior Technical Advocacy Associate
Appliance Standards Awareness Project