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*Comment Received From: Beth
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NRDC Tire Efficiency Rulemaking 15-Day Comments

Additional submitted attachment is included below.



August 3, 2026

California Energy Commission
Docket Unit
715 P Street
Sacramento, CA 95814

RE: Docket No. 26-TIRE-01 – Replacement Tire Efficiency Program

Dear Commissioners:

The Natural Resources Defense Council (NRDC) appreciates the opportunity to comment on the California Energy Commission's (CEC) proposed 15-day modifications to the Replacement Tire Efficiency Program. As discussed in our June comments, NRDC strongly supports the establishment of California's first replacement tire efficiency standards and commends the Commission for developing a program that will reduce transportation energy use, lower greenhouse gas emissions, improve air quality, and save Californians money.

We appreciate the Commission's continued efforts to refine the proposal in response to stakeholder feedback. While the revised proposal preserves the program's core framework and expected long-term benefits, several of the proposed revisions unnecessarily delay or could reduce those benefits. We therefore encourage the Commission to reconsider several aspects of the 15-day language before adopting the final regulations.

Reconsider the Phase II Implementation Timeline

The 15-day language delays implementation of Phase I standards from January 1, 2028, to January 1, 2029, and Phase II standards from January 1, 2031, to January 1, 2033, stating that these changes are intended to provide regulated entities additional time to prepare for compliance. NRDC agrees that providing additional implementation time for Phase I is reasonable. Allowing an additional year for manufacturers and the Commission to prepare for implementation should help ensure successful program launch.

However, NRDC is not persuaded that delaying Phase II by an additional two years is necessary. Phase II standards are expected to deliver the majority of the program's long-term consumer savings, energy reductions, and emissions benefits, and manufacturers will necessarily begin planning and redesign for products for Phase II well in advance of its effective date. A Phase II compliance date of January 1, 2032 would still provide manufacturers with substantial lead time while allowing Californians to realize these benefits sooner.

Implementation flexibility is important, but it should not come at the expense of unnecessarily delaying significant consumer, climate, and energy benefits. NRDC therefore encourages the Commission to adopt a Phase II compliance date of no later than January 1, 2032.

Commit to Developing Standards for All-Season Winter Performance Tires

The 15-day language creates a new category for all-season winter performance tires and exempts these tires from the replacement tire energy performance and wet grip standards. NRDC understands that establishing appropriate standards for this category may present technical challenges. However, all-season winter performance tires represent a growing segment of the replacement tire market and excluding them indefinitely could create a large loophole in the program that could be exploited and reduce the program's long-term energy savings. NRDC is concerned that introducing a new exempt tire category at this stage of the rulemaking, without corresponding performance standards, risks creating an unintended gap in the program's coverage.

NRDC encourages the Commission to use the data collected through implementation of this program to promptly evaluate this tire category and establish appropriate efficiency standards at the earliest practicable opportunity once sufficient technical information becomes available.

Closely Monitor Implementation of the Limited-Production Exemption

The revised 15-day language modifies the limited-production exemption by removing the requirement that qualifying tires have remained below the production threshold during prior calendar years. While NRDC recognizes the importance of preserving flexibility for genuinely limited-production tire lines, we are concerned that this exemption could create opportunities to avoid compliance if interpreted or implemented too broadly. The Commission should closely monitor implementation of this exemption and ensure it is applied only as intended, so that manufacturers cannot circumvent the standards through artificial product differentiation or fragmentation of higher-volume tire lines.

In conclusion, NRDC appreciates the Commission's thoughtful work throughout this rulemaking and continues to strongly support adoption of California's first replacement tire efficiency standards. With the targeted modifications recommended above, the Commission can preserve implementation flexibility, reduce opportunities for exploitation of potential loopholes, and accelerate the substantial consumer, energy, and climate benefits this program will deliver.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Beth Hammon". The signature is written in a cursive, flowing style.

Beth Hammon
Senior Advocate
Natural Resources Defense Council