

DOCKETED	
Docket Number:	26-TIRE-01
Project Title:	Tire Efficiency Rulemaking
TN #:	271804
Document Title:	ENSO Supplemental Comments- Proposed Amendments to Replacement Tire Efficiency Program
Description:	N/A
Filer:	System
Organization:	ENSO
Submitter Role:	Public
Submission Date:	8/3/2026 11:49:55 AM
Docketed Date:	8/3/2026

*Comment Received From: ENSO
Submitted On: 8/3/2026
Docket Number: 26-TIRE-01*

ENSO CEC Supplemental Comments

Additional submitted attachment is included below.



August 3, 2026

Chair David Hochschild

California Energy Commission

715 P Street, Sacramento, CA 95814

**RE: ENSO'S SUPPLEMENTAL COMMENTS ON THE PROPOSED AMENDMENTS
TO THE REPLACEMENT TIRE EFFICIENCY PROGRAM (DOCKET NO. 26-TIRE-01)**

Dear Chair Hochschild,

On behalf of ENSO, this filing responds to the Commission's July 17, 2026 Notice of Additional Public Comment Period and Summary of Changes. Our comments in support of the proposed rule, filed on June 9, 2026, remain on the record and continue to reflect ENSO's position. This supplemental filing addresses four specific elements of the July 17 amendments.

1. WE SUPPORT THE COMMISSION'S PROPOSED TECHNICAL CARVE-OUTS.

The Commission's addition of objective, criteria-based definitions for all-season winter performance tires (§3302(a)(4)), competition tires (§3302(a)(11)), and large off-road tires (§3302(a)(24)) is a sensible response to legitimate technical and safety concerns raised during the initial comment period. These carve-outs preserve safety and specialty-application performance without weakening the rule's coverage of the mainstream replacement-tire market that is the source of substantially all consumer benefit. The addition of ISO 15222:2025 as the wet-grip test method for light-truck and commercial replacement tires (§3303(b)(2)) is likewise a well-founded technical correction, given that ISO 23671:2021 is explicitly scoped to passenger cars. ENSO supports these amendments.

2. WE RESPECTFULLY URGE THE COMMISSION TO HOLD PHASE 2 AT 2031.

The proposed two-year deferral of Phase 2 (from January 1, 2031 to January 1, 2033 across §§3306(a)(3), (b)(3), (c)(3), (d)(3), and (e)(3)) represents substantial foregone consumer savings and deferred emissions reductions during the delay window, on benefits the Commission itself has quantified at approximately \$1 billion in annual consumer savings and 2.0 million metric tons of CO₂e in annual emissions reductions when the rule is at full effect. The technology required to meet the 7.1 N/kN Phase 2 threshold is not aspirational. As our June 9 comments established, ENSO already sells A/A-rated tires (at or below 6.5 in ISO rolling resistance coefficient) at prices competitive with, and often below, comparable products from incumbent brands. The Consumer Reports data referenced in ACEEE's comments further confirms that the most efficient tires already deliver longer tread lifetimes than less efficient alternatives. We respectfully urge the Commission to hold Phase 2 at January 1, 2031, or, in the alternative, to introduce an interim tightening between 2031 and 2033 that captures a portion of the deferred consumer and environmental benefit.

3. WE OPPOSE THE EXPANSION OF §3306(b) TO INCLUDE RUN-FLAT AND EXTENDED MOBILITY TIRES.

The inclusion of run-flat and extended mobility tires (as newly defined in §3302(a)(51)) within §3306(b)'s higher RRC thresholds of 9.8 N/kN in Phase 1 and 8.5 N/kN in Phase 2, rather than the baseline standard of §3306(a), is not justified on efficiency grounds and should be reconsidered. Run-flat and extended mobility tires are increasingly fitted as original equipment on premium electric vehicles, a segment our June 9 comments identified as the segment that stands to benefit most from the rule. Exempting this fast-growing EV-relevant category at higher RRC thresholds meaningfully narrows the rule's application to the very market it was substantially designed to serve. From our engineering experience, run-flat and extended mobility construction is not incompatible with lower rolling resistance; the historic tradeoff reflects product-line prioritization rather than physical necessity. We respectfully urge the Commission either to apply the baseline §3306(a) standard to run-flat and extended mobility tires, or, at minimum, to commit to converging §3306(a) and §3306(b) thresholds in a defined future phase.

4. WE RESPECTFULLY RENEW OUR SUGGESTION OF A VOLUNTARY CEC TIRE EFFICIENCY LABEL.

The July 17 amendments do not directly address the constructive suggestion offered in our June 9 comments: that the Commission authorize, but not require, tire manufacturers to display a standardized CEC tire-energy-efficiency label on their products. We respectfully renew that suggestion. The Commission has now created much of the technical foundation for such a label through the leaf-rating system in §3307, including a formalized graphic in Figure 1; extending that rating from its current internal database use to voluntary physical display at the point of sale would be a modest incremental step with material consumer benefit. To keep implementation cost effectively zero, the CEC could design the label so that it can be incorporated directly onto the existing manufacturer labels already applied to every new tire, avoiding the need for a separate or additional sticker. A voluntary framework preserves manufacturer discretion while allowing innovators and EV-focused brands to evidence their efficiency performance directly to California consumers, in a format analogous to the well-established labels used in the European Union, Japan, and South Korea.

5. ENSO REMAINS AVAILABLE TO THE COMMISSION AS A TECHNICAL RESOURCE.

As stated in our June 9 comments, ENSO is committed to working with the Commission through implementation. We remain willing to share real-world rolling-resistance, wet-grip safety, tread-life, and EV-durability data, including data specific to run-flat and extended mobility applications, and are available for briefings with the Commission's staff at any time as the rule is finalized.

We thank the Chair and Commissioners for their continued leadership on this important matter.

Respectfully,

Gunnlaugur Erlendsson

CEO, ENSO

cc:

Honorable Gavin Newsom, Governor, State of California

Wade Crowfoot, Secretary for Natural Resources, State of California

Nancy Skinner, Commissioner, California Energy Commission