

DOCKETED	
Docket Number:	26-TIRE-01
Project Title:	Tire Efficiency Rulemaking
TN #:	272034
Document Title:	Edward Comments - Opposition to California Replacement Tire Efficiency Regulations
Description:	N/A
Filer:	System
Organization:	Edward
Submitter Role:	Public
Submission Date:	8/18/2026 5:17:49 PM
Docketed Date:	8/19/2026

Comment Received From: Edward

Submitted On: 8/18/2026

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Opposition to California Replacement Tire Efficiency Regulations

I strongly oppose California's Replacement Tire Efficiency Program.

This is another example of California adding regulations and costs to everyday necessities while residents are already struggling with the high cost of living. It is exactly this type of continued regulation that contributes to the frustration many residents and businesses feel about living and operating in California.

The California Energy Commission claims that consumers will ultimately save money through reduced fuel consumption. I question whether those projected savings will outweigh the actual costs consumers will experience once this regulation reaches the marketplace. The analysis relies on assumptions about future tire prices, fuel prices, driving habits, tire life, and fuel-efficiency improvements. Real-world costs may be very different.

A tire is first and foremost a safety product. Consumers select tires based on many factors, including traction, tread life, durability, vehicle type, driving conditions, load requirements, performance, and price. Fuel efficiency should be one consideration, but the government should not restrict otherwise safe tires simply because they do not meet a state-imposed efficiency target.

I am also concerned about unintended consequences. Restricting the number of tires that can legally be sold in California could reduce competition and consumer choice, increase prices, create supply issues for certain vehicles and tire sizes, and disproportionately affect working families who cannot afford more expensive replacement tires.

California residents already pay some of the highest costs in the country for housing, fuel, utilities, insurance, taxes, vehicle registration, and other necessities. At some point, policymakers need to consider the cumulative financial impact of regulation rather than evaluating every new mandate in isolation.

If an efficient tire truly saves consumers more money over its life, provide consumers with clear information about rolling resistance, estimated fuel savings, safety performance, tread life, and price and allow them to make an informed decision. Consumers who see value in an efficiency-focused tire can choose it without California eliminating other safe and affordable options.

California should be working to make the state more affordable and competitive, not continually adding mandates that increase costs and reduce consumer choice. Policies like this contribute to the perception that California is becoming increasingly expensive

and difficult for ordinary working people to live in, and they are part of the reason some residents consider leaving the state.

I urge the California Energy Commission to reconsider this regulation, conduct a more conservative and transparent analysis of the true retail costs and real-world savings, and prioritize affordability, safety, competition, and consumer choice.

Please do not impose another mandate on Californians based on projected savings that may never materialize for many individual drivers.