

| <b>DOCKETED</b>         |                                                                                              |
|-------------------------|----------------------------------------------------------------------------------------------|
| <b>Docket Number:</b>   | 26-TIRE-01                                                                                   |
| <b>Project Title:</b>   | Tire Efficiency Rulemaking                                                                   |
| <b>TN #:</b>            | 272090                                                                                       |
| <b>Document Title:</b>  | Alex Revekko Comments - Concerns Regarding the New Tire Efficiency Standard (CEC Rulemaking) |
| <b>Description:</b>     | N/A                                                                                          |
| <b>Filer:</b>           | System                                                                                       |
| <b>Organization:</b>    | Alex Revekko                                                                                 |
| <b>Submitter Role:</b>  | Public                                                                                       |
| <b>Submission Date:</b> | 8/20/2026 4:03:14 PM                                                                         |
| <b>Docketed Date:</b>   | 8/20/2026                                                                                    |

*Comment Received From: Alex Revekko*

*Submitted On: 8/20/2026*

*Docket Number: 26-TIRE-01*

## **Concerns Regarding the New Tire Efficiency Standard (CEC Rulemaking)**

To the Office of Commissioner Nancy Skinner and the California Energy Commission, I am writing as a California resident and vehicle owner to express serious concerns about the newly adopted tire rolling resistance standard, phasing in at 9.1 N/kN in 2029 and tightening to 7.2 N/kN in 2033.

On the substance: rolling resistance and traction are not independent variables. Lowering rolling resistance generally means a harder compound and shallower tread, both of which can reduce wet weather braking performance and off road grip. Owners of trucks, SUVs, and off road capable vehicles rely on load range E and all terrain or mud terrain tires that are inherently higher in rolling resistance due to reinforced sidewalls and aggressive tread. Industry estimates suggest roughly 70 percent of tires currently on shelves would not meet the new standard by 2033. Pushing the entire market toward lower traction tires is not simply a consumer convenience issue, it is a public safety concern. Reduced grip means longer stopping distances and less control in wet or emergency conditions, and a statewide mandate that shifts the whole tire supply in that direction deserves the same safety scrutiny given to any other vehicle equipment regulation.

There is also an environmental contradiction worth addressing directly. Tire engineers describe rolling resistance, wet grip, and tread wear resistance as the tire industry's magic triangle, three properties that trade off against each other. Improving rolling resistance without an equal focus on wear resistance can mean faster tread wear. Tire wear particles are already a significant and growing source of air and water microplastic pollution. If this standard pushes manufacturers to prioritize rolling resistance at the expense of tread durability, the result could be more tire particulate entering the air and waterways, working against the very environmental goals the rule is meant to serve. I have not seen anything in the Commission's materials addressing this tradeoff, and I would like to understand how it was evaluated.

I also have concerns about the process. This standard originates from a law passed in 2003 that sat unused for more than two decades, revived by Commissioner Skinner and adopted by CEC Chair David Hochschild's own admission without his prior awareness it existed. The Commission's science and engineering seat, currently held by Commissioner Skinner, is intended to bring technical rigor to exactly this kind of decision. Her academic background is a bachelor's degree in conservation and a master's in education, with a career spent in environmental advocacy and legislative office rather than in engineering, materials science, or automotive safety. That does not disqualify her from the seat, appointees are not expected to personally run the technical analysis, but it does raise the question of what independent engineering review, separate from Commission staff, was applied to the wet traction, off road safety, and tread wear implications of this rule before adoption.

I would ask the Commission to clarify what independent wet traction and off road safety

testing accompanied the rolling resistance testing of the 537 tire types referenced in the decision, whether tread wear rate and resulting particulate emissions were evaluated as part of this rulemaking, whether an exemption or alternate compliance path is being considered for load range E and off highway rated tires, and whether the Commission intends to reopen this rule for public comment given how long the underlying statute had been dormant.

I would appreciate a substantive response addressing these points.

Respectfully,

Alex Revekko