

**DOCKETED**

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<b>Project Title:</b>	Tire Efficiency Order Instituting Information Proceeding
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**SCE comments on Replacement Tire Efficiency proceeding**

*Additional submitted attachment is included below.*



An EDISON INTERNATIONAL® Company

March 7, 2023

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1516 Ninth Street  
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Submitted online at: <https://www.energy.ca.gov/tire>

**Re: Tire Efficiency Order Instituting Information Proceeding (Docket No. 20-TIRE-01)**

Southern California Edison (SCE) appreciates the opportunity to comment on the California Energy Commission’s (CEC’s) Tire Efficiency Order Instituting Information proceeding.

SCE appreciates that CEC’s efforts to improve the minimum efficiency standards for replacement tires in order to reduce emissions and other environmental impacts, while helping consumers save money. Additionally, SCE appreciates CEC staff’s efforts to address safety by commenting that the proposal must not affect tire safety pursuant to Assembly Bill 844;<sup>1</sup> and by collaborating with Smithers and Pacific Gas and Electric Company to conduct tire testing to inform the proceeding.<sup>2</sup>

As an electric utility with 50,000 square miles of service territory, SCE’s fleet – including its light-duty vehicles and pick-up trucks – needs to be capable of operating in an on- and off-road environment. Because SCE crews work in various conditions – including inclement weather – it is important for the tires on our vehicles to have sufficient traction to help ensure the safety of our crews and others. Additionally, we believe that some consumer vehicles may also be used for on- and off-road applications.

Although the Smithers testing effort found that for replacement tires, there was no clear relationship between efficiency and traction or wet grip, it also found that tires marketed as efficient had on average a lower traction rating.<sup>3</sup> Additionally, it is SCE’s understanding that the “wet grip” testing was specific to either asphalt or concrete surfaces and did not consider off-

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<sup>1</sup> CEC Draft Framework of California’s Replacement Tire Efficiency Program, February 2023, p. 1.

<sup>2</sup> See Smithers, Summary of Tire Testing for California’s Replacement Tire Efficiency Program, per AB 844 January 2023, issued March 1, 2023. Available at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=20-TIRE-01>

<sup>3</sup> CEC Draft Framework of California’s Replacement Tire Efficiency Program, February 2023, p. 10.

road applications for dirt, mud, or sandy soils.<sup>4</sup> Accordingly, SCE requests that the CEC be mindful of the on- and off-road applications and ensure that any minimum standards established for efficiency do not negatively impact the ability for tires to provide the necessary traction to support safety in an off-road situation.

Thank you for considering our comments regarding this important regulation.

Sincerely,

/s/ Rosalie Barcinas

Rosalie Barcinas  
Director, Electrification & Customer Services Policy  
Regulatory Affairs  
Southern California Edison

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<sup>4</sup> Smithers, Summary of Tire Testing for California's Replacement Tire Efficiency Program, per AB 844 January 2023, issued March 1, 2023, p. 12.