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<b>Project Title:</b>	Tire Efficiency Order Instituting Information Proceeding
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**NRDC Comments on the Tire Efficiency Order Instituting Information Proceeding**

See attached comments

*Additional submitted attachment is included below.*



March 23, 2023

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California Energy Commission  
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**Re: Comments of the Natural Resources Defense Council (NRDC) on the Tire Efficiency Order Instituting Information Proceeding (Docket No. 20-TIRE-01)**

On behalf of the Natural Resources Defense Council (NRDC), and our more than 95,000 members in California, we appreciate the opportunity to comment on the California Energy Commission's (CEC's) Tire Efficiency Order Instituting Information proceeding and the CEC Staff's efforts in developing the Draft Framework proposing replacement tire labeling, consumer education, and minimum performance standards.

We strongly support the CEC's proposed Draft Framework and efforts to improve minimum efficiency standards for replacement tires, which are thoughtfully designed to help promote emission reductions and customer fuel cost savings without compromising safety or negatively impacting California drivers.

Assembly Bill 844 directs the CEC to adopt a tire energy efficiency program for replacement tires to ensure that replacement tires sold in the state are at least as energy efficient, on average, as tires sold in the state as original equipment on new passenger cars and light-duty trucks. The rating, consumer education, and minimum performance standards set put in the CEC's proposed Replacement Tire Efficiency Program are appropriately designed to help the state realize this goal, improving replacement tire efficiency that promotes emission reductions and customer fuel cost savings without compromising safety.

As the Draft Framework and February 14th Staff Workshop highlighted, the CEC extensively considered impacts of the proposed minimum standards on safety and tire longevity, finding that the proposed program will not adversely affect these critical factors. The CEC found that efficient tires with good safety characteristics are already available and that modern improvements to tire design and composition show rolling resistance can be improved without adversely affecting safety or tire longevity. As the Staff Workshop presentation detailed, the proposed standards are also not expected to degrade tire longevity or lead to higher lifetime tire replacement costs. The CEC further notes it "will continue to monitor potential impacts of the proposed program and will make adjustments accordingly," providing important safeguards and

future flexibility to address any concerns about safety or lifetime costs raised by others in this docket.

We appreciate the considerable effort and thoughtfulness Staff has demonstrated in developing the Draft Framework, and look forward to continuing to work with the CEC to support this critical effort.

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