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<b>Project Title:</b>	Tire Efficiency Order Instituting Information Proceeding
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*Comment Received From: Coalition for Clean Air + 8 other groups*  
*Submitted On: 5/17/2023*  
*Docket Number: 20-TIRE-01*

**Support for Tire Efficiency Order Instituting Information Proceeding  
(Docket No 20-TIRE-01)**

*Additional submitted attachment is included below.*

May 17, 2023

Hannon Rasool, Director Fuels and Transportation Division  
Sebastian Serrato, Project Manager Fuels and Transportation Division  
California Energy Commission  
1516 Ninth Street Sacramento, CA 95814-5512

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

Dear Mr. Rasool:

The undersigned organizations support CEC's proposed Replacement Tire Efficiency Program, which is thoughtfully designed to help promote emission reductions and customer fuel cost savings. Adopting the minimum efficiency standards for replacement tires would finally fulfill a legislative mandate from 20 years ago -- AB 844 (Nation, Chapter 645, Statutes of 2003) -- and would help California achieve its carbon neutrality, clean air, and public health mandates.

Currently, almost all new cars are equipped with low rolling resistance tires that boost each new car's efficiency and reduce emissions. However, when California consumers go to purchase replacement tires for their cars, they are unaware that almost all replacement tires sold throughout the state are not low-rolling resistance tires. As a result, once they replace their car's tires, they are unknowingly spending more money on gasoline, and increasing the amount of pollution that is caused by fuel burning.

The proposal includes a first-in-the-nation tire fuel efficiency standard for passenger vehicle replacement tires sold in California that aligns with the tires sold with new cars, along with consumer outreach and education at the point of sale so California drivers can easily compare tire efficiency, safety, and other attributes.

Because more efficient tires allow vehicles to travel further with less fuel, the standards would substantially reduce fuel consumption, climate causing emissions, and air pollution. Californians with low incomes will benefit, as fuel costs are a higher percentage of their budget and they tend to live in communities most impacted by air pollution. Improved tire efficiency will help shield California consumers from volatile fuel prices.

Fuel cost savings to consumers are projected to amount to \$2.5 billion annually at full implementation by 2035. The rule would reduce between 5 and 6 million metric tons of carbon dioxide equivalent emissions per year between 2030 and 2035, which is equivalent to taking about 5% of California's passenger vehicles off the road today.

Importantly, CEC staff have considered potential impacts to both safety and durability and found that the proposed standards would not negatively impact either. 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 reduce emissions and save consumers money, so we urge the Commission to adopt them at the earliest opportunity.

Respectfully Submitted,

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