



June 24, 2009

James Boyd, Vice Chair; Presiding Member, Transportation Committee
Karen Douglas, Commissioner; Associate Member, Transportation Committee
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 07-FET-1
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET	
07-FET-1	
DATE	JUN 24 2009
RECD.	JUN 24 2009

**Re: 07-FET-1 Fuel Efficient Tire Proceeding: Comments on June 10, 2009
Committee Workshop**

Dear Commissioners Boyd and Douglas:

On behalf of the Natural Resources Defense Council (NRDC), I am pleased to provide comments to the presentations and discussion during the California Energy Commission (CEC) committee workshop on the Fuel Efficient Tire Program on June 10, 2009.

NRDC urges the Commission to act expeditiously to adopt regulations that rate tires according to their rolling resistance and designate deserving tires as “fuel efficient tires.” We support the Staff Draft Regulations (CEC-600-2009-010-SD) because they include strong data reporting requirements and an easy-to-use rating system.

Strong requirements for manufacturers to report tire efficiency data is an essential underpinning of an effective program. Requiring the reporting of test results gives confidence in tire performance and becomes the basis for consumers to make informed purchasing decisions. Requiring the data to be transparent and available in a public database also encourages competition among manufacturers to deliver the best product. Assembling data on tire aspects in addition to efficiency will allow the Commission and public to track the interactions between efficiency and other tire characteristics. The database also allows tire retailers and marketers to analyze the results and find new, innovative ways to educate consumers. For example, during the workshop, a representative of retailer Tire Rack.com commented that access to rolling resistance data is important for the development of their own consumer information programs.

The proposed rating system is beneficial because of its simplicity and potential to encourage competition. The 15 percent threshold enables consumers to easily distinguish the most efficient tires that fit their vehicle. It also serves as simple guide for large retailers that that want to preferentially stock the most efficient models. Because the rating system is keyed to the best performers, it automatically keeps up with advances in the marketplace and encourages competition among tire manufacturers with a ‘race to the top’. The tire manufacturer that produces the most efficient model for a size and load

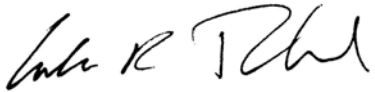
class effectively determines how many other tires can be labeled as efficient in that class. Therefore, this labeling concept has the potential to promote new efficiency innovations in tires.

The Tire Efficiency Program can be an important contributor to California's goals to reduce petroleum consumption and cut global warming pollution. It is complimentary to the Air Resources Board's recently adopted Tire Pressure Program as an Early Action under AB32. However, the Tire Efficiency Program has the potential to save even more fuel. ARB estimates that the Tire Pressure Program will save each Californian about \$12 per year, which is roughly equivalent to the savings from a one percent improvement in fuel economy for an average passenger vehicle. When fully implemented, the Tire Efficiency Program has the potential to improve fuel economy of vehicles by as much as four percent.

NRDC urges the Energy Commission to adopt tire efficiency reporting and rating requirements without delay. Furthermore, we encourage the Commission to propose tire efficiency standards to ensure the transformation of the tire marketplace.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Luke R. Tonachel".

Luke Tonachel
Vehicles Analyst, NRDC

Cc: Ray Tuvell, Manager, CEC Fuel Efficient Tire Program