



April 10, 2013

Commissioner Karen Douglas
Chair Robert Weisenmiller
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Via: docket@energy.ca.gov

California Energy Commission

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12-ALT-02

TN # 70269

APR 10 2013

Subject: Including a Fuel Efficient Tire Program within the AB118 2013/14 Investment Plan

Dear Commissioner Douglas and Chair Weisenmiller:

We applaud California's leadership achieving \$65 billion in energy savings through Demand-Side Management programs that improve the energy efficiency of the built environment, as noted recently by Governor Brown. We urge you to expand these successful programs to cover passenger vehicle replacement equipment, beginning with fuel efficient tire technology by using a modest amount of AB118 funding to implement a pilot program to save consumers money at the pump and reduce emissions from the existing fleet.

The AB32 Scoping Plan estimates that low rolling-resistance tires and low friction engine oil technology would reduce GHG emissions by over 3 million tons per year. Energy Solutions estimates that robust implementation of incentive programs to promote these technologies, mainly for tires, could save consumers \$750 million annually, after program costs. An incentive program can succeed as a standalone effort to provide market pull; and can also work in tandem with standards to raise the performance floor.

We believe that, with a relatively modest investment, the AB118 program could help achieve the savings highlighted above. To attract potential applicants to design the program and implement pilot-level projects, we recommend highlighting the potential benefits of these programs in the Emerging Opportunities section of the AB118 2013/14 Investment Plan.

Pilot level funding via the Emerging Opportunities category would provide the opportunity to kick-start the program and create a platform to leverage additional funding sources for a larger scale effort. Thank you for your consideration of our comments.

Sincerely,

Max Baumhefner
Natural Resources Defense Council

Tyson Eckerle
Energy Independence Now