

March 12, 2026

The Honorable Gavin Newsom

Governor, State Capitol

Sacramento, CA 95814

CC: President Pro-Tem Limon, Speaker Rivas, Chair Hochschild, Commissioner Skinner

**RE: Support for CEC Replacement Tire Efficiency Proceeding**

Dear Governor Newsom,

We, the undersigned organizations, write to express our strong support for the California Energy Commission's (CEC) ongoing proceeding to adopt replacement tire efficiency standards.<sup>1</sup> These efficiency standards are a much-needed solution to the affordability crisis, saving drivers billions of dollars while avoiding needless climate emissions and air pollution.

This CEC tire efficiency proceeding will improve affordability for California drivers. Once fully implemented, this rule would save drivers \$192 on average in extra gasoline costs over the lifetime of a set of tires.<sup>2</sup> Ensuring replacement tires are as efficient as those shipped on new cars, as the proceeding generally aims to achieve, would save California drivers \$4 billion in total through 2035.<sup>3</sup>

Replacement tire efficiency standards would also generate significant environmental benefits. Coalition for Clean Air and Consumer Federation of America have found if replacement tires were as efficient as those shipped on new cars, PM 2.5 emissions reductions would be equivalent to the yearly exhaust emissions from nearly 600,000 diesel school buses, and the CO<sub>2</sub> emissions reductions would be equivalent to the yearly emissions from 84 gas-fired power plants.<sup>4</sup>

The tire efficiency pre-rulemaking also fulfills a mandate placed on CEC by the state legislature more than 20 years ago. AB 844 (Nation) of 2003 directed CEC to adopt tire efficiency standards, which the Commission is now pursuing in the pre-rulemaking. Over the last five years, CEC has facilitated a collaborative pre-rulemaking process, during which CEC staff have held multiple public workshops and invited extensive engagement from interested parties, including industry stakeholders.<sup>5</sup> We are encouraged to see CEC has taken steps to conclude the pre-rulemaking process, including with the release of an economic impact analysis.<sup>6</sup> This

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<sup>1</sup> Docket 20-TIRE-01

<sup>2</sup> Economic Impact Analysis of the Replacement Tire Efficiency Program. See Table 2 and Table 6. Based on a weighted-average of the values for lighter vehicles (\$179 at 81% share of fleet) and heavier vehicles (\$246 at 19% share of fleet), calculated as  $(\$179 \times 81\%) + (\$246 \times 19\%) = \$192$ . Found at: [https://dof.ca.gov/media/docs/forecasting/economics/major-regulations/major-regulations-table/26-TIRE-01-\(2\)-RTEP-SRIA\\_re-remediated.pdf](https://dof.ca.gov/media/docs/forecasting/economics/major-regulations/major-regulations-table/26-TIRE-01-(2)-RTEP-SRIA_re-remediated.pdf)

<sup>3</sup> Economic Impact Analysis of the Replacement Tire Efficiency Program. See Pages 1 and 15.

<sup>4</sup> See "Burning Rubber and Cash: How Inefficient Replacement Tires Are Costing Californians" (July 2025). Found at: <https://www.ccair.org/california-drivers-spend-an-extra-180-on-gas-due-to-inefficient-replacement-tires/>

<sup>5</sup> See Docket Log for Docket 20-TIRE-01.

<sup>6</sup> Economic Impact Analysis of the Replacement Tire Efficiency Program.

analysis lays out a comprehensive and compelling proposal. We now urge CEC to avoid any further delay and to move expeditiously towards a rulemaking.

CEC's prompt action is more important than ever, as the federal government attempts to erase vehicle fuel economy standards that save California drivers thousands of dollars per vehicle. A replacement tire efficiency standard will help protect drivers from rising costs, while also protecting vulnerable Californians from harmful air pollution.

We thank you for your leadership and support for common-sense tire efficiency standards that advance affordability, carbon neutrality, clean air, and public health. We ask that CEC moves quickly to open a formal rulemaking to deliver these benefits for all Californians.

Respectfully signed,

**Chris Harto, Manager**  
**Consumer Reports**

**Robert Herrell, Executive Director**  
**Consumer Federation of California**

**Bill Magavern, Policy Director**  
**Coalition for Clean Air**

**Beth Hammon, Senior Advocate**  
**NRDC**

**David Reichmuth, Senior Scientist**  
**Union of Concerned Scientists**

**Laura Deehan, State Director**  
**Environment California**

**Will Barrett, AVP Nationwide Clean Air Policy**  
**American Lung Association**

**Joel Ervice, Associate Director**  
**Regional Asthma Management & Prevention**  
**A Project of the Public Health Institute**

**Rachel Aland, Transportation Director**  
**American Council for an Energy Efficient Economy**

**Andrew deLaski, Executive Director**  
**Appliance Standards Awareness Project**