

August 2, 2013

Mike Tollstrup
Chief, Project Assessment Branch
1001 I Street
California Air Resources Board
Sacramento, California 95814

Subject: AB32 Scoping Plan Update – Passenger Vehicle In-Use Efficiency

Dear Mr. Tollstrup:

Thank you for the opportunity to provide suggestions for the AB32 Scoping Plan update. We encourage you to build on California's leadership reducing transportation emissions by including passenger vehicle in-use efficiency in the scoping plan update.

In particular, we recommend that the update include a pathway to improve deployment of fuel efficient passenger vehicle replacement tire and engine oil technology. The scoping plan update should include programs starting with tire incentives for a limited time period and ratings followed by standards to permanently shift the market. These programs would allow drivers of every income level to participate directly in the benefits of AB32. We also encourage evaluation of potential measures for improved engine oil technology.

The original scoping plan (measure T-4) set goals of over three million metric tons per year of GHG savings and \$750 million in annual consumer savings from these technologies. These goals are achievable with a very high benefit/cost ratio and can leverage CEC research on low rolling resistance tires as well as precedents in Europe, Japan and South Korea.

We have attached suggested language for the scoping plan update and appreciate your consideration of our comments. Please contact me or have your staff contact me at epike@energy-solution.com or (510) 482-4420 x239 if you have any questions.

Sincerely,



Ed Pike, P.E.
Senior Project Manager

Attachment

Suggested Text for AB32 Scoping Plan Update

Passenger Vehicle Efficiency Measures Update

Several passenger vehicle in-use efficiency measures would complement adopted AB32 policies for new vehicles, fuels and vehicle miles traveled. Two opportunities identified in the original scoping plan include low rolling resistance replacement tires and low viscosity engine oil. Implementing these measures will build on the adopted tire inflation early action measure and result in additional emission reductions of greater than 3 million metric tons per year and consumer cost savings of greater than \$750 million per year. These programs would be an opportunity for drivers of every income level, including low income drivers, to participate directly in the fuel cost savings and other benefits of AB32.

Tires

Low rolling resistance replacement tire technology can reduce long-term GHG and fuel consumption by 4 percent or greater. This technology is expected to continue to advance for new vehicles due to California/federal GHG and fuel economy standards and vehicle labeling but no programs are in place for the replacement tire market. (Low rolling resistance tires are required for heavy duty vehicles under California's Smartway regulation.)

A two-phased California approach is recommended to maximize the benefits of low rolling resistance replacement tires for passenger vehicles. First, a consumer incentive and education pilot program could be implemented on a regional basis, and potentially expanded state-wide (assuming that funding is available) to create consumer pull for the most energy efficient replacement tires. This program should be followed by the adoption of standards, leveraging existing CEC research, to permanently shift the market. California can also leverage experience from tire programs developed in the European Union, Japan and South Korea to develop programs and avoid the risk that low-quality replacement tires pushed out of international markets could be shifted to California.

Low Friction Engine Oils

Engine oil formulations can also impact a vehicle's GHG emissions because reducing friction from the internal engine parts will improve the overall efficiency of the engine. This, in turn, reduces the engine load and fuel consumption. Use of low friction engine oils in passenger vehicles can result in up to 2 percent GHG reduction. Initial efforts could focus on a consumer incentive and education pilot program, potentially followed by implementation of a broader program and/or regulation.