July 30, 2018

Heidi King

Deputy Administrator

National Highway Traffic Safety Administration

1200 New Jersey Avenue, S.E.

Washington, D.C. 20590

Re: Tesla, Inc.'s, Mid-Model Year Fuel Economy Report

Dear Deputy Administrator King,

Tesla, Inc., ("Tesla" or the "Company") respectfully submits the following mid-year report pursuant to 49 C.F.R. Part 537, Automotive Fuel Economy Reports. This report details the projected average fuel economy figures and technical information for the 2018 Model Year ("MY") Tesla Model S (engine families: JTSLV00.0L1S and JTSLV00.0L2S), Model X (engine family: JTLSV00.0L2X) and Model 3 (engine family: JTSLV00.0L13 and JTSLV00.0L23) pursuant to 49 CFR Part 537, Automotive Fuel Economy Reports. Tesla, Inc., will have the following variants available for sale in the United States: the 2018 MY Model S and Model 3, both zero-emissions battery electric passenger vehicles, and the 2018 MY Model X, a zero-emissions battery electric multipurpose passenger vehicle.

Model Type	Model S				Model X			Model 3				
Carline	75	75D	P100D	100D	75D	P100D	100D	Model 3 Long Range	Model 3 Long Range AWD	Model 3 Long Range AWD Performance	Model 3 AWD	Model 3

§537.7(b): Projected average and required fuel economy. The projected average fuel economy for all 2018 MY Tesla Model S, Model X and Model 3 variants (engine families as mentioned above) is equivalent to **397.6 miles per gallon** ("mpg"). This figure is determined from energy-use data recorded during electric vehicle range testing in accordance with 40 C.F.R. § 86.1770-99 and 13 C.C.R. § 1962(e)

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for all-electric vehicles. Energy-use data recorded during testing is calculated pursuant to the petroleum-equivalent fuel economy equation contained within 10 C.F.R. § 474.3—Electric and Hybrid Vehicle Research, Development, And Demonstration Program; Petroleum-Equivalent Fuel Economy Calculation.

§537.7(b)(3)(i)(E): Target Average Fuel Economy. Pursuant to the requirements in 49 C.F.R. § 531.5, the model type configuration, target average fuel economy, and sales volumes for the 2018 MY Model S, Model X and Model 3 vehicles are as shown below.

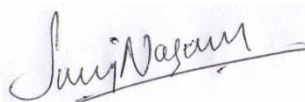| Model Type, Configuration Fuel Economy (537.7 (c)(1) & (2))											
Model Type	**Model S**										
Target Fuel Economy	35.0										
Combined Fuel Economy	324.7	341.0	322.9	329.7	308.7	286.1	294.4	457.4	418.5	418.5	435.7	440.1
Configuration	75	75D	P100D	100D	75D	P100D	100D	Model 3 Long Range	Model 3 Long Range AWD	Model 3 Long Range AWD Performance	Model 3 AWD	Model 3
Projected sales	[0]	[15,000]	[3,000]	[10,000]	[15,000]	[2,000]	[11,000]	[75,000]	[50000]	[17000]	[2000]	[0]

§ 537.7(5): Sufficiency of Fuel Economy Projection. For purposes of the Motor Vehicle Information and Cost Savings Act (Pub. L. 92-513), as amended by the Energy Policy and Conservation Act (Pub. L. 94-163), and 49 C.F.R. § 537.7(a)(5), the above stated Fuel Economy projection sufficiently represents the average fuel economy for the 2018 MY.

§ 537.7(c): Model type and configuration fuel economy and technical information. Please refer to the attached Excel spreadsheet for Model Type, Configuration Fuel Economy, and Technical Information required by § 537.7(c).

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If you have any questions regarding this report, please feel free to contact me at ▮▮▮▮▮▮▮▮▮ or snagaraj@tesla.com.

Sincerely,

Suraj Nagaraj
Director, Vehicle Homologation