

December 28<sup>th</sup>, 2017

The Honorable Mark R. Rosekind  
 Administrator  
 National Highway Traffic Safety Administration  
 1200 New Jersey Avenue, SE  
 Washington D.C. 20590

Subject: Tesla, Inc. 2018 Pre-Model Year Fuel Economy Report

Dear Mr. Friedman:

Tesla, Inc. (“Tesla” or the “Company”) respectfully submits the following pre-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 Vehicles pursuant to 49 CFR Part 537, Automotive Fuel Economy Reports. Tesla, Inc. will have the following variants of the 2018 MY vehicles and are all zero-emissions battery electric passenger vehicles, available for sale in the USA.

<b>Model Type</b>	Model S			
<b>Configuration</b>	75R	75D	P100D	100D

<b>Model Type</b>	Model X		
<b>Configuration</b>	75D	P100D	100D

<b>Model Type</b>	Model 3	
<b>Configuration</b>	E3R	E3D

**§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 is Equivalent to **417.3 miles per gallon** (“mpg”). The figure is determined from energy-use data recorded during electric vehicle range testing in accordance with 40 CFR §86.1770-99 and 13 CCR §1962(e) for all-electric vehicles. Energy-use data recorded during testing is calculated pursuant to the petroleum-equivalent fuel economy equation

contained within 10 CFR § 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 requirements of 49 CFR §531.5, the model type configuration, target average fuel economy, and sales volumes for the 2018 MY Model S, X and 3 vehicles are as shown below.

Model Type	Model S			
Target Fuel Economy	35.26			
Combined Fuel Economy	324.65	340.96	322.92	329.68
Configuration	75R	75D	P100D	100D
Projected sales	[ 0 ]	[ 10,000 ]	[ 1,000 ]	[ 10,000 ]

Model X		
34.53		
308.75	286.09	294.36
75D	P100D	100D
[ 5,000 ]	[ 1,000 ]	[ 5,000 ]

<b>Model 3</b>	
38.19	
445.99	437.66
E3R	E3D
[ 10,000 ]	[ 185,000 ]

**§ 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 CFR § 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 attached excel spreadsheet for Model Type, Configuration Fuel Economy, and Technical Information required by §537.7(c).

\* \* \*

If you have any questions regarding this report, please feel free to contact me at (650) 681-5630 or [kmorgan@tesla.com](mailto:kmorgan@tesla.com).

Sincerely,



Ken Morgan  
Director – Business Development  
Tesla, Inc.