



December 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 2019 Pre-Model Year Fuel Economy Report

Dear Administrator King,

Tesla, Inc. ("Tesla" or the "Company"), respectfully submits the following pre-year report pursuant to 49 C.F.R. § 537, Automotive Fuel Economy Reports. This report details the projected average fuel economy figures and technical information for the 2019 Model Year ("MY") Tesla vehicles pursuant to 49 CFR § 537, Automotive Fuel Economy Reports. Tesla will have the following variants of the 2019 MY vehicles and are all zero-emissions battery electric passenger vehicles, available for sale in the United States.

Model Type	Model S		
Configuration	75D	P100D	100D

Model Type	Model X		
Configuration	75D	P100D	100D

Model Type	Model 3					
Configuration	E1R	E1D	E2R	E3R	E3D	E3DP

§537.7(b): Projected average and required fuel economy. The projected average fuel economy for all 2019 MY Tesla Model S, Model X and Model 3 variants is equivalent to **397.0 miles per gallon** (“mpg”). The 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) 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. This projection does not include the NHTSA CAFE calculations for converting GHG credits into CAFE credits because NHTSA notified us that it was re-evaluating the calculation as it pertained to electric vehicles.

§537.7(b)(3)(i)(E): Target Average Fuel Economy. Pursuant to requirements of 49 C.F.R. §531.5, the model type configuration, target average fuel economy, and projected sales volumes for the 2019 MY Model S, X and 3 vehicles are as shown below.

Model Type	Model S		
Target Fuel Economy	39.4		
Combined Fuel Economy	332.41	322.92	340.185
Configuration	75D	P100D	100D
Projected sales	15000	3000	10000

Model Type	Model X		
Target Fuel Economy	39.4 (29.3 when Light truck)		
Combined Fuel Economy	308.75	286.09	289.15
Configuration	75D	P100D	100D
Projected sales	15000	2000	11000

Model Type	Model 3					
Target Fuel Economy	39.7					
Combined Fuel Economy	439.69	43.90	457.355	4.845	40.40	423.95
Configuration	E R	E D	E3R	E3D	E3DP	E2R
Projected sales	0	2000	75000	50000	7000	2000

§ 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.

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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 2019 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).

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

Sincerely,

Ken Morgan

Ken Morgan
Sr. Director, Business Development