



July 31, 2019

Jack Danielson
 Acting 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 Mr. Danielson,

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 2019 Model Year (“MY”) Tesla Model X (engine family: KTSLV00.0L2X) 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 2019 MY Model X, a zero-emissions battery electric multipurpose passenger vehicle.

	Model X						
Carline	75 D	100 D	P100 D	Standard Range	Long Range	Performance 20" Wheels	Performance 22" Wheels

§537.7(b): Projected average and required fuel economy. The projected average fuel economy for all 2019 MY Tesla Model X variants (engine families KTSLV00.0L2X) in the light truck category is equivalent to **299.8 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) 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. When air conditioning efficiency and off cycle credits are taken into account, the projected average fuel

economy for all 2019 MY Tesla Model X variants (engine families KTSLV00.0L2X) in the light truck category is equivalent to **445.2 miles per gallon** (“mpg”).

§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 2019 MY Model X vehicles are as shown below.

Model Type	Model X						
Target Fuel Economy	29.9						
Combined Fuel Economy	308.7	283.2	289.1	330.4	313.6	292.8	257.0
Configuration	75D	P100D	100D	SR	LR	P20	P22
Projected sales	[300]	[100]	[1,300]	[300]	[700]	[150]	[150]

§ 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 2019 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 (917) 520-9121 or kmorgan@tesla.com.

Sincerely,



Ken Morgan
 VP, Business Development