



January 3, 2020

James Owen  
 National Highway Traffic Safety Administration  
 1200 New Jersey Avenue, S.E.  
 Washington, D.C. 20590

**Re: Tesla, Inc. 2020 Pre-Model Year Fuel Economy Report**

Dear Mr. Owen:

Tesla, Inc. (“Tesla” or the “Company”) respectfully submits the following Pre-Model 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 2020 Model Year (“MY”) Tesla Vehicles pursuant to 49 CFR Part 537, Automotive Fuel Economy Reports. Tesla, Inc. will have the following variants of the 2020 MY vehicles and are all zero-emissions battery electric passenger vehicles, available for sale in the USA.

|               |         |    |     |     |
|---------------|---------|----|-----|-----|
| Model Type    | Model S |    |     |     |
| Configuration | SR      | LR | P19 | P21 |

|               |         |    |     |     |
|---------------|---------|----|-----|-----|
| Model Type    | Model X |    |     |     |
| Configuration | SR      | LR | P20 | P22 |

|               |         |         |        |        |        |            |            |            |
|---------------|---------|---------|--------|--------|--------|------------|------------|------------|
| Model Type    | Model 3 |         |        |        |        |            |            |            |
| Configuration | SR RWD  | SR+ RWD | MR RWD | LR RWD | LR AWD | LR P18 AWD | LR P19 AWD | LR P20 AWD |

|               |         |                 |                       |
|---------------|---------|-----------------|-----------------------|
| Model Type    | Model Y |                 |                       |
| Configuration | LR AWD  | Performance AWD | Performance AWD (21") |

**§537.7(b): Projected average and required fuel economy.** The projected average fuel economy for all 2020 MY Tesla Model S, Model X and Model 3 variants is Equivalent to **409.2 miles per gallon** (“mpg”). The projected average fuel economy figures in this report are based on the fuel economy performance for Model S, Model X, and Model 3 variants. Testing is not yet complete on the Model Y variants, so Tesla does not yet have sufficient data to state the actual fuel economy performance for the Model Y variants. The projected average fuel economy figure is determined from Tesla’s current best estimates for the Model S, Model X, and Model 3 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. This projection does not include the NHTSA CAFE calculations for converting GHG credits into CAFE credits.

**§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 projected sales volumes for the 2020 MY Model S, X, 3 and Y vehicles are as shown below. Testing is not yet complete on the Model Y variants, so Tesla does not yet have sufficient data to state the actual fuel economy performance for the Model Y variants.

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|                       |                |          |         |         |
|-----------------------|----------------|----------|---------|---------|
| Model Type            | <b>Model S</b> |          |         |         |
| Target Fuel Economy   | 40.9           |          |         |         |
| Combined Fuel Economy | 356.6          | 362.9    | 335.0   | 312.9   |
| Configuration         | SR             | LR       | P19     | P21     |
| Projected sales       | [0]            | [11,000] | [1,000] | [1,000] |

|                       |                              |          |         |         |
|-----------------------|------------------------------|----------|---------|---------|
| Model Type            | <b>Model X</b>               |          |         |         |
| Target Fuel Economy   | 40.9 (30.6 when Light Truck) |          |         |         |
| Combined Fuel Economy | 330.4                        | 313.6    | 292.8   | 257.0   |
| Configuration         | SR                           | LR       | P20     | P22     |
| Projected sales       | [0]                          | [17,000] | [1,000] | [1,000] |

|                       |                |          |        |        |          |            |            |            |
|-----------------------|----------------|----------|--------|--------|----------|------------|------------|------------|
| Model Type            | <b>Model 3</b> |          |        |        |          |            |            |            |
| Target Fuel Economy   | 41.2           |          |        |        |          |            |            |            |
| Combined Fuel Economy | 457.7          | 486.7    | 427.3  | 437.7  | 417.7    | 431.1      | 386.8      | 379.7      |
| Configuration         | SR RWD         | SR+ RWD  | MR RWD | LR RWD | LR AWD   | LR P18 AWD | LR P19 AWD | LR P20 AWD |
| Projected sales       | [1,000]        | [47,000] | [0]    | [0]    | [46,000] | [1,000]    | [1,000]    | [12,000]   |

|                       |                |                 |                       |
|-----------------------|----------------|-----------------|-----------------------|
| Model Type            | <b>Model Y</b> |                 |                       |
| Target Fuel Economy   | 40.9           |                 |                       |
| Combined Fuel Economy | TBD            | TBD             | TBD                   |
| Configuration         | LR AWD         | Performance AWD | Performance AWD (21") |
| Projected sales       | [0]            | [84,000]        | [0]                   |

**§ 537.7(b)(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 does not sufficiently represent the average fuel economy for the 2020 MY because Tesla lacks sufficient data to state the actual fuel economy performance of the Model Y variants. Tesla will submit a supplemental report after testing on the Model Y variants has been completed.

**§ 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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 BUSINESS INFORMATION

If you have any questions regarding this report, please feel free to contact me at



