



July 30, 2020

James Owens
 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 2020 Model Year (“MY”) Tesla Model S (engine families: LTSLV00.0L2S), Model X (engine family: LTSLV00.0L2X), Model 3 (engine family: LTSLV00.0L13 and LTSLV00.0L23), and Model Y (engine family: LTSLV00.0L2Y) 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 2020 MY Model S, Model 3 and Model Y, all zero-emissions battery electric passenger vehicles, the 2020 MY Model X, a zero-emissions battery electric multipurpose passenger vehicle.

Model Type	Model S						Model X					Model 3						Model Y				
Configuration	SR	LR	LR+	LR+(J-Cell)	P ⁸	P21	SR	LR	LR+	P20	P22	SR RWD	SR+ RWD	MR RWD	LR RWD	LR AWD	LR P ⁸ AWD	LR P ⁹ AWD	LR P20 AWD	LR AWD	Performance AWD	Performance AWD (21 ¹)

§537.7(b): Projected average and required fuel economy. The projected average fuel economy for all 2020 MY Tesla Model S, Model X, Model 3 and Model Y variants (engine families: LTSLV00.0L2S, LTSLV00.0L2X, LTSLV00.0L13, LTSLV00.0L23 and LTSLV00.0L2Y) in the domestic passenger category is equivalent to **408.1 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 2020 MY Tesla Model S, Model X, Model 3 and Model Y variants (engine families: LTSLV00.0L2S, LTSLV00.0L2X, LTSLV00.0L13, LTSLV00.0L23 and LTSLV00.0L2Y) in the domestic passenger category is equivalent to **738.5 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 2020 MY Model S, Model X, Model 3 and Model Y vehicles are as shown below.

Model Type, Configuration Fuel Economy (537.7 (c)(1) & (2))																						
Model Type	Model S						Model X					Model 3						Model Y				
Target Fuel Economy	38.0						37.2					41.2						39.7				
Combined Fuel Economy	356.6	362.9	379.6	386.0	335.0	312.9	330.4	313.6	361.5	292.8	257.0	457.7	486.7	427.3	437.7	417.7	431.1	386.8	379.7	392.9	390.0	360.2
Configuration	SR	LR	LR+	LR+ (J-Cell)	P19	P21	SR	LR	LR+	P20	P22	SR RWD	SR+ RWD	MR RWD	LR RWD	LR AWD	LR P18 AWD	LR P19 AWD	LR P20 AWD	LR AWD	Performance AWD	Performance AWD (21*)
Projected sales	[0]	[5,000]	[3,000]	[3,000]	[2,000]	[1,000]	[0]	[9,000]	[3,000]	[1,000]	[1,000]	[1,000]	[47,000]	[0]	[0]	[44,000]	[1,000]	[1,000]	[12,000]	[48,000]	[4,000]	[4,000]

§ 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 C.F.R. § 537.7(a)(5), the above stated Fuel Economy projection sufficiently represents the average fuel economy for the 2020 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).

* * *

If you have any questions regarding this report, please feel free to contact me at [REDACTED] or [REDACTED].

Sincerely,

[REDACTED]

[REDACTED]

Director, Business Development