

April 5, 2022

Via email: expartecommunications@hq.doe.gov

Kevin Stork
Vehicle Technologies Program, EE-3V,
U.S. Department of Energy
1000 Independence Avenue, SW,
Washington, DC 20585-0121

Re: Ex Parte Memorandum for Meeting on March 31, 2022

Petroleum Equivalence Factor, Notification of Petition for Rulemaking
Docket Number EERE-2021-VT-0033

On March 31, 2022, Pete Huffman, Luke Tonachel, and Ben Longstreth (Natural Resources Defense Council), Joshua Berman (Sierra Club), Vera Pardee (outside counsel for Sierra Club), and Avi Mersky (American Council for an Energy-Efficient Economy) met virtually with Kevin Stork and Kara Podkaminer (Department of Energy, Office of Energy Efficiency & Renewable Energy). Also in attendance were Kevin Ennis and Joseph Bayer (Department of Transportation, National Highway Traffic Safety Administration (NHTSA)).

We discussed matters concerning NRDC and Sierra Club's pending petition for rulemaking to update Department of Energy (DOE) regulations at 10 C.F.R. part 474 for calculating equivalent petroleum-based fuel economy values for electric vehicles for use in determining automakers' compliance with the Department of Transportation's Corporate Average Fuel Economy (CAFE) program. We encouraged DOE to update the regulations to align with the required statutory factors at 49 U.S.C. § 32904(a)(2)(B) and to reflect the best available data. We also encouraged DOE to coordinate with NHTSA on implementing updated regulations.

If you require any additional information, please contact us.

Sincerely,

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