Mercedes-Benz

Mercedes-Benz
Research & Development
North America, Inc.

22 May 2026

To: expartecommunications@hq.doe.gov

From: Mercedes-Benz Research & Development North America, Inc

Subject: Ex Parte Meeting on Petroleum Equivalency Factor

Mercedes-Benz Research & Development North America, Inc. (hereinafter "Mercedes-Benz") is submitting this information pursuant to the Department of Energy's ("DOE") guidance on *ex parte* communications (74 Fed. Reg. 52795, Oct. 14, 2009).

On May 7, 2026, Mercedes-Benz met with the DOE for about an hour regarding the petroleum-equivalent fuel economy calculation established by the Secretary of Energy under the authority of 49 U.S.C. § 32904(b)(2).

Participants for DOE were:

- Kevin Stork, Technology Manager in Vehicle Technologies Office
- Laura Zuber, Attorney
- Austin Brown, Director, Transportation Technologies Office
- Andrew Freigang, Special Advisor, Critical Minerals and Energy Innovation

Participants for Mercedes-Benz were:

- Amy Klikenberger, Director, Safety, Fuels, and Reg Affairs
- Nicola Whiteman, General Manager, Public Policy & External Affairs
- Noelle Baker, Staff Engineer, Fuel Economy and Emissions
- Ivan Tibavinsky, Senior Engineer, Fuels
- Paul Skroupskas, VP of Test Operations and Certification

The issues discussed during the meeting were DOE's recent Petroleum-Equivalent Fuel Economy (PEF) Calculation interim final rule (91 Fed. Reg. 7810, Feb. 19, 2026), the follow-up rulemaking described therein, and the need for DOE to give full effect to all statutory considerations and to update its analysis as required under 49 U.S.C. § 32904(b)(2). We requested a timely update and emphasized the importance of regulatory stability. We also reviewed the potential impact of different PEF levels on projected Mercedes-Benz fleet compliance with the Department of Transportation's Corporate Average Fuel Economy (CAFE) program requirements and encouraged DOE to coordinate with NHTSA on implementing updated regulations.

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