

## MEMORANDUM

**To:** DOE Office of General Counsel  
(via [expartecommunications@hq.doe.gov](mailto:expartecommunications@hq.doe.gov))

**From:** Michael Hartrick, Alliance for Automotive Innovation

**Date:** June 9, 2022

**Re:** Record of Ex Parte Communication Concerning Petroleum Equivalency Factor (10 CFR Part 474)

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This memorandum documents a June 9, 2022 video conference between the Alliance for Automotive Innovation,<sup>1</sup> Department of Energy, and National Highway Traffic Safety Administration (NHTSA) on the subject of the Petroleum Equivalency Factor.

Auto Innovators described:

1. The PEF is a critical issue for the auto industry, affecting current Corporate Average Fuel Economy (CAFE) compliance, NHTSA's finding of maximum feasible fuel economy for model year 2024-2026 light-duty vehicles, and potentially NHTSA CAFE rulemaking for 2027 and later model year vehicles.
2. A key component of the PEF is the "Fuel Content Factor" which provides an incentive for the production of electric vehicles consistent with that of other alternative fuels, and that enables more similar treatment of electric vehicles between the NHTSA CAFE program and the U.S. Environmental Protection Agency's (EPA's) light-duty vehicle greenhouse gas (GHG) program.
3. Any changes to the PEF must consider manufacturer compliance, NHTSA CAFE rulemaking, and harmonization between the NHTSA CAFE and EPA GHG programs.

### List of Attendees

Peter Cochran (Department of Energy)  
David Greene (Advisor to National Highway Traffic Safety Administration)  
Mike Hartrick (Alliance for Automotive Innovation)  
Kara Podkaminer (Department of Energy)  
Greg Powell (National Highway Traffic Safety Administration)  
Kevin Stork (Department of Energy)

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<sup>1</sup> Formed in 2020, the Alliance for Automotive Innovation is the singular, authoritative and respected voice of the automotive industry. Focused on creating a safe and transformative path for sustainable industry growth, the Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. The organization is directly involved in regulatory and policy matters impacting the light-duty vehicle market across the country. Members include motor vehicle manufacturers, original equipment suppliers, as well as technology and other automotive-related companies. The Alliance for Automotive Innovation is headquartered in Washington, DC, with offices in Detroit, MI and Sacramento, CA. For more information, visit our website <http://www.autosinnovate.org>.