



## NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY

ANN ARBOR, MI 48105

April 7, 2025

IACD-2025-03 (Revised) (LDV/LDT/ICI/LIMO)

**SUBJECT: Fuel Economy Label Information for 2025 and 2026 Model Years**

Dear Manufacturer:

The purpose of this manufacturer information letter is to provide information designed to guide you in your 2025 and 2026 model year fuel economy labeling program. This updated letter is being revised to correct the five-year fuel costs of an average new vehicle from \$8,750 to \$8,500, and to clarify the 2026 model year average new vehicle fuel economy, which remains 29 MPG.

Enclosure 1, "Fuel Economy Supplementary Information for the 2026 Model Year," contains information necessary to print fuel economy labels, including information about 2026 fuel costs, fuel economy ranges, smog and fuel economy ratings, and more. Except for the fuel economy ranges described in section 2 of Enclosure 1, nothing in this document impacts labels for 2025 model year vehicles. Labels for 2025 model year vehicles should continue to use the fuel prices and ratings information specified in [CD-2023-10](#) (December 21, 2023). All 2026 model year labels should use the information specified in this guidance letter.

Enclosure 2, "Determining Fuel Economy and Greenhouse Gas Ratings for the 2026 Model Year," details the calculations used to determine the fuel economy and greenhouse gas ratings to be used for all 2026 model year vehicles.

If you have any questions about these instructions, please contact your certification team representative.

Sincerely,

A handwritten signature in black ink, appearing to read "Byron J. Bunker".

Byron Bunker, Director  
Implementation, Analysis and Compliance Division  
Office of Transportation and Air Quality

Enclosures

cc: Austin Brown, DOE

**Enclosure 1 to IACD-2025-03 (Revised)**  
**Fuel Economy Supplementary Information for the 2026 Model Year**

**1. Annual Fuel Cost Estimates for 2026 Model Year Vehicles**

Annual fuel cost estimates used on the fuel economy labels of 2026 model year vehicles must be based on the following fuel cost estimates. You should contact your EPA representative if you need a fuel price for a fuel not listed below.

Regular Unleaded Gasoline	\$3.30	per gallon
Mid-Grade Unleaded Gasoline	\$3.80	per gallon
Premium Unleaded Gasoline	\$4.15	per gallon
Diesel Fuel	\$3.60	per gallon
E85	\$2.85	per gallon
CNG	\$2.30	per gallon equivalent
Electricity	\$0.17	per kilowatt-hour

The annual fuel cost estimates should be calculated based on 15,000 annual vehicle miles, the above listed fuel cost, and the adjusted combined MPG (0.55/0.45 harmonic weighting of the adjusted city and highway MPG values, then rounded to the nearest whole MPG). Note that the annual fuel cost is required to be rounded to the nearest \$50. The generally accepted method for achieving this is to divide the unrounded annual fuel cost by 50, round the result to the nearest \$1 (using ASTM rounding), and then multiply by 50. Using this method, an unrounded value that ends in exactly 25 will be rounded down, and an unrounded value that ends in exactly 75 will be rounded up (e.g., \$1225 rounds to \$1200 and \$1275 rounds to \$1300). Fuel prices shown here are applicable only to 2026 model year vehicles and should not be applied to any 2025 or earlier model year vehicles.

**2. Fuel Economy Ranges to be placed on FE Labels for 2025 and 2026 Model Year Vehicles**

Labels must contain the range of the highest and lowest combined MPG values of vehicles within each vehicle class, commonly called the “fuel economy range” for a comparable class of vehicles. Pursuant to 40 CFR 600.314-08(d), EPA most recently provided the combined MPG ranges for comparable classes of vehicles via EPA guidance letter CD-2023-10 (December 21, 2023). The ranges in that guidance were generally applicable to the 2025 model year, as well as to any 2024 model year vehicles manufactured more than 15 days after that guidance letter was published. This guidance letter updates those ranges and should be used for both 2026 model year vehicles as well as any 2025 model year vehicles manufactured more than 15 days after the publication date of this guidance letter (ref. 40 CFR 600.301).

If, in the course of the model year, manufacturers add a model with MPG values outside the ranges provided in the EPA guidance letter, manufacturers should update the ranges for that

model appropriately, increasing or decreasing the range as needed. Because these ranges are based on 2025 models, EPA may provide updated ranges during the 2026 model year.

<b>Car Line Class</b>	<b>Estimated Fuel Economy Range (MPG)*</b>
	Combined (55% city/45% highway)
Two Seaters	9 - 53
Minicompact Cars	16 - 116
Subcompact Cars	17 - 90
Compact Cars	17 - 116
Midsize Cars	15 - 137
Large Cars	14 - 146
Small Station Wagons	21 - 52
Midsize Station Wagons	17 - 93
Large Station Wagons	0 - 0
Small Pick-up Trucks	20 - 38
Standard Pick-up Trucks	12 - 87
Vans	0 - 0
Special Purpose Vehicle	15 - 29
Minivans	20 - 83
Small Sport Utility Vehicles	14 - 125
Standard Sport Utility Vehicles	12 - 115

\* Note that ranges do not include the MPG values of FFVs while operating on E85.

### **3. Fuel Economy and Greenhouse Gas Ratings for 2026 Model Year Vehicles**

The labels require a “slider bar” that displays MPG and greenhouse gas (GHG) ratings. The ratings for the 2026 model year were determined according to the methodology described in the regulations (see Enclosure 2) and should apply to all 2026 model year vehicles, even those labeled after EPA issues new ratings for the 2027 model year. In other words, all 2026 models will be rated using the same system, presented in this guidance, to ensure comparability across all 2026 models.

All vehicles require an MPG rating determined from the table below. The regulations require that gasoline vehicles display a single rating, based on the rounded combined MPG, as determined for model year 2026 vehicles in the table below. Gasoline vehicles are not required to display a separate GHG rating. Flexible fuel (E85) vehicles are rated based on gasoline operation and, like gasoline vehicles, require only a single rating based on gasoline operation. The MPG value to be used to determine a rating for plug-in hybrid electric vehicles is a combined city/highway “utilitized” MPG value (i.e., a weighted combination of the charge-depleting MPGe and the charge-sustaining MPG). The MPG value used to determine the fuel economy rating for electric vehicles (EVs) is the combined MPGe displayed on the label which is

derived from charge depleting testing with a 5-cycle adjustment factor applied (0.7 or vehicle specific).

<b>Model Year 2026 Rating Scale for Fuel Economy</b>	
<b>Fuel Economy Rating</b>	<b>Combined City/Highway Fuel Economy (MPG)</b>
10	≥121
9	67 - 120
8	47 - 66
7	36 - 46
6	29 - 35
5	23 - 28
4	19 - 22
3	16 - 18
2	14 - 15
1	≤13

Under the regulations, manufacturers must calculate a combined city/highway CO<sub>2</sub> value, both for display on the label (for all vehicles) and to calculate a GHG rating (for certain vehicles that operate on fuels other than gasoline). Note that the combined city/highway CO<sub>2</sub> is determined just like the comparable MPG value, i.e., it is a sales-weighted model type value determined from sub-configuration test results, not a mathematical conversion of the model type MPG value. It is determined in the same way the MPG value is, using the derived 5-cycle, modified 5-cycle, or full 5-cycle methodology. The CO<sub>2</sub> value to be used to determine a rating for plug-in hybrid electric vehicles is a combined city/highway “utilitized” gram per mile value (i.e., a weighted combination of the charge-depleting CO<sub>2</sub> emissions and the charge-sustaining CO<sub>2</sub> emissions).

Vehicles that operate on fuels other than gasoline (including plug-in hybrid electric vehicles) must determine a GHG rating from the following table. (Gasoline-E85 flexible fuel vehicles should establish a GHG rating on each fuel, although for labeling purposes these vehicles receive MPG and GHG ratings as if they were gasoline vehicles. The GHG rating on E85 should not be placed on the label.) If the numerical GHG rating determined from this table is identical to the numerical fuel economy rating, then the label should display only one “pointer” above the slider bar. If the GHG rating differs from the fuel economy rating (as will be the case, for example, for some diesel, plug-in hybrid, electric and CNG vehicles) then the label should display two pointers on the slider. The pointer above the slider bar should represent the fuel economy rating, and the pointer below the slider bar should represent the GHG rating. The CO<sub>2</sub> value for fully electric vehicles in the 2026 model year is zero grams per mile, therefore, the GHG rating will be “10.” In some cases, the fuel economy (MPG) rating for EVs may differ from the GHG rating, therefore requiring two pointers.

Model Year 2026 Rating Scale for Greenhouse Gases	
Greenhouse Gas Rating	Combined City/Highway CO <sub>2</sub> g/mile
10	0 - 74
9	75 - 134
8	135 - 191
7	192 - 250
6	251 - 312
5	313 - 395
4	396 - 480
3	481 - 573
2	574 - 658
1	≥659

These ratings were determined according to the methodology described in the regulations. The specific methodology is described in Enclosure 2.

#### **4. Average New Vehicle Fuel Economy and Cost Values**

The new label requires a comparison of estimated five-year fuel costs for the labeled vehicle to the estimated five-year fuel costs for the average new vehicle. In addition, the fuel economy and five-year estimated fuel cost of the average vehicle are reported in the fine print of the label. Per the regulations, the five-year fuel cost for the average new vehicle is based on regular unleaded gasoline cost and 15,000 miles per year, rounded to the nearest \$50. Thus, for the 2026 model year, based on the regular unleaded gasoline price projection in this memorandum, the statement in the label footer should read as follows:

“The average new vehicle gets 29 MPG and costs \$8,500 to fuel over 5 years.”

#### **5. Smog Rating**

Criteria for establishing smog ratings are now generally contained in the regulations (see 40 CFR 600.311-12(g)). However, for consistency with previous guidance and to provide a single resource for label ratings, we reproduce the smog rating scale for model year 2026 below.<sup>1</sup> As with previous guidance, the rating for a vehicle will continue to be based on the federal emission standards to which a vehicle is certified. When we established the Tier 3 emission standards for motor vehicles, we included regulations for smog ratings that reflect the new standards, including the transitional period during which the new standards are phased in. However, the regulatory action left open the question of how to rate a TZEV – a vehicle category established by the California Air Resources Board (ARB) in the context of their ZEV program.<sup>2</sup> Some commenters on the Tier 3 rulemaking asked that EPA develop appropriate

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<sup>1</sup> The ratings table below replicates Table 1 in 40 CFR 600.311-12(g).

<sup>2</sup> See 79 FR 23592, April 28, 2014.

ratings that account for both the exhaust certification and all-electric range of TZEVs. We responded that EPA planned to include smog ratings for TZEVs in the annual fuel economy guidance letter and therefore were not finalizing a smog rating for California TZEVs in the Tier 3 rulemaking.

We have determined that a TZEV is a vehicle category established for the sole purpose of the California ZEV program, and that its purpose in that program is to credit TZEVs (which are expected to be mostly plug-in hybrid electric vehicles) for their partial operation on electricity. There are no provisions currently in EPA label regulations to factor electric range into the smog rating, and as such, the rating for TZEVs – as for all other vehicles – are based on the standards to which they are certified. Thus, there is no specific TZEV entry in the smog ratings table. The table in the regulations that describes ratings for 2026 model year vehicles will continue to apply. TZEVs will get a rating of 7 or 8, depending upon the standards to which they are certified. EPA may consider a ratings system that accounts for the all-electric range of plug-in hybrid electric vehicles in future revisions to the fuel economy labeling provisions.

<b>Rating</b>	<b>U.S. EPA Tier 3 Emission Standard</b>	<b>California Air Resources Board LEV III Emission Standard</b>
1	Bin 160	LEV160
2	Bin 125	ULEV125
3		
4	Bin 70	ULEV70 or ULEV 60
5	Bin 50	ULEV50 or ULEV 40
6	Bin 30	SULEV 25 or SULEV30
7	Bin 20	SULEV 15 or SULEV20
8		
9		
10	Bin 0	ZEV

## **6. Quick Response (QR) Code**

Please note that successful implementation of the QR Code requires more frequent updating of the online database at [www.fueleconomy.gov](http://www.fueleconomy.gov). Given this, it is unlikely that data entered by manufacturers will be subject to the degree of quality checking by EPA that manufacturers may have become accustomed to. It is imperative that manufacturers adopt a greater responsibility in ensuring the accuracy and completeness of their data when they enter it.

Paragraph 600.302-12(b)(6) requires that the label contain a QR Code. A QR Code is a two-dimensional bar code that contains text – in this case a website URL. The regulations note that EPA will specify the URL that should be encoded in the QR Code.

In consultation with DOE, we have identified a methodology for determining the URL for a given model type. Using this methodology, every model type will have a unique URL assigned to it, allowing mobile devices to access the data for that specific model type. The URL should have the following form:

<http://fueleconomy.gov/qr?id=YYYYMMMX>

Where:

YYYY = the four digit model year of the model type (e.g., 2026);

MMM = the three character manufacturer code as entered in EPA's Verify database, in all capitals (e.g., TKX); and

XXX = the model type index as entered in EPA's Verify database, where all values are represented by 3 digits using preceding zeros as necessary (e.g., 123, 073, 004).

## **7. Label Text Regarding the Best Overall Vehicle**

The label requires two statements regarding the best overall vehicle – one regarding MPG and another, in a different location on the label, regarding CO<sub>2</sub> grams/mile performance. Similar to how we treat the fuel economy ranges of comparable vehicles, we typically ask the manufacturer to refer to the guidance from the prior model year until updated guidance is published. For 2026 model year vehicles the following statements should appear in the designated places on the label:

“The best vehicle rates 146 MPGe.”

“The best emits 0 grams per mile (tailpipe only).”

## **8. Expressing the All-Electric Driving Range of a Blended Plug-In Hybrid Electric Vehicle**

To ensure that the all-electric driving range of a “blended” plug-in hybrid electric vehicle (PHEV) is accurately characterized by the manufacturer on the label, we request that the all- electric range (if any) be expressed as a range of values. (A blended PHEV is a PHEV that mixes gasoline use with stored electricity from the grid before the grid electricity is fully depleted.) For example, instead of describing the range as “12 miles”, the label should state the range as “0 to 12 miles” or “0-12 miles” (replace “0” with an appropriate non-zero value if a non-zero value accurately describes the real-world operation of the vehicle).

We have found that use of the derived 5-cycle method (with a limit on the adjustment of 0.7) may not be an accurate method for characterizing some of the performance values of some vehicles. For example, aggressive driving such as that found on the US06 may immediately call upon the internal combustion engine of a PHEV, thus reducing the all-electric range not by 30%, but by 100%, i.e., to zero miles. Because the label values are intended to account for the effects of aggressive driving, air conditioning use, cold temperatures, and other factors, the

label should attempt to describe the real-world effects of these factors on the all-electric driving range of a PHEV. These factors, either singly or in combination, can significantly reduce or even eliminate the all-electric driving range of a PHEV. Consequently, we request that manufacturers describe the all-electric range of a PHEV as a range with a lower bound that is zero, unless the manufacturer can justify, with an engineering analysis or test results, that a non-zero value is appropriate (i.e., that a non- zero all-electric range will occur even when aggressive driving, air conditioning, cold temperatures, and other real-world factors are encountered in actual use).

**Enclosure 2 to IACD-2025-03 (Revised)**  
**Determining Fuel Economy and Greenhouse Gas Ratings for the 2026 Model Year**

Model type data from the 2025 model year (i.e., the Fuel Economy Guide data) as available in December of 2024 was used to determine the ratings for the 2026 model year as follows.

**Step 1: Determine the midpoint of the rating scale**

The regulations specify the methodology by which the midpoint of the rating scale (the point between the ratings of 5 and 6) is determined.<sup>3</sup>

EPA previously published midpoint values for the 2012-2018 model years based on the estimated average achieved fuel economy values under the footprint-based Corporate Average Fuel Economy (CAFE) standards.<sup>4</sup> We used the fleet-wide (cars and trucks combined) projected CAFE values for the purpose of determining the previously-published values. However, those fleet-wide values were based on projections of car and light truck sales, and their relative market shares, that have shifted since the rulemaking was published. Cars have been declining in market share, and trucks increasing, since the 2013 model year. Further, the previously published projections for vehicle footprint and for air conditioning and off-cycle credits also differed from what EPA saw in the 2017-2019 model year data. These trends have caused the previously published midpoint value projections to likely be too high.

In this guidance for prior model years, EPA has indicated that the midpoint values could be adjusted to use updated projections as may be appropriate for a given year. Thus, we first revised our methodology for the 2019 model year and used a consistent methodology for the 2020 model year by basing the midpoint on the individual car and truck values. For MY 2021, we also updated the footprint and vehicle credit assumptions consistent with our most recent year of complete data.

For MY 2022-2025, and now MY 2026, EPA revised the methodology for determining the midpoint value again by using updated tailpipe projections from the 2020 SAFE Rulemaking as a basis for analysis. These tailpipe projections are not influenced by credits and the market share assumptions for car compared to truck sales are somewhat recent. The analysis produces a midpoint value of 29 MPG. Thus, for the 2026 model year, the midpoint of the rating scale is the fuel consumption corresponding to 29 MPG, or 0.03448 gallons/mile. Additionally, 29 MPG serves as the value representing the average vehicle for the 2026 model year for the purpose of calculating the 5-year fuel cost of the average vehicle.

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<sup>3</sup> French, R. Memorandum to Docket No. EPA-HQ-OAR-2009-0865, "Adjusting Combined City/Highway CAFE Fleet Values to Determine Equivalent 5-Cycle Label Values." May 18, 2011.

<sup>4</sup> 2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards, Final Rule, Federal Register 77 (15 October 2012): 62641, Table I-2.

Label Breakpoint Values Model Years 2012-2025	
2012	22
2013	23
2014	23
2015	24
2016	25
2017	26
2018	27
2019	27
2020	27
2021	27
2022	27
2023	28
2024	28
2025	28
2026	29

### **Step 2: Determine the value defining a score of 10**

Using the 2025 model type data, a statistical analysis of mean fuel consumption and standard deviation was performed, resulting in a negative  $MPG_{10}$ . As this is not possible, the 2024 model type data was used. Using the 2024 model type data, the mean fuel consumption value (0.04070 gal/mi) and the standard deviation of the data (0.01623 gal/mi). Thus, the minimum MPG (rounded to the nearest whole mile per gallon) to receive a rating of 10 is:

$$MPG_{10} = \frac{1}{0.04070 - (2 \times 0.01623)} = 121 \text{ MPG}$$

Therefore, rounded combined MPG values greater than or equal to 121 receive a rating of 10.

### **Step 3: Determine the value defining a score of 1**

As in Step 2, we use the mean fuel consumption value and the standard deviation of the latest model year model type data. The regulations specify that the mean plus two standard deviations establishes the fuel consumption value defining a rating of 1. To be consistent with how we established the rating of 10, this equation determines the minimum fuel consumption value to receive a rating of 2, where values less than this get a rating of 1. Thus, the minimum MPG (rounded to the nearest whole mile per gallon) to receive a rating of 2 is:

$$MPG_1 = \frac{1}{0.03539 + (2 \times 0.01778)} = 14 \text{ MPG}$$

Therefore, rounded combined MPG values less than 14 MPG receive a rating of 1.

#### **Step 4: Establish the ratings from 6 to 9**

Using the midpoint of the rating scale established in Step 1 (converted to fuel consumption) and the fuel consumption value defining a rating of 10 established in Step 2, we can then determine the intermediate ratings of 6 through 9. The regulations require that we divide this range into equal fuel consumption intervals. Doing so results in the following divisions between ratings, shown in both consumption and rounded miles per gallon:

Rating	Lower limit (gal/mi)	Lower limit (MPG)	Upper limit (MPG)
10	-0.00017	121	--
9	0.01482	67	120
8	0.02148	47	66
7	0.02783	36	46
6	0.03448	29	35

#### **Step 5: Establish the ratings from 2 to 5**

Using the midpoint of the rating scale established in Step 1 (converted to fuel consumption) and the fuel consumption value defining a rating of 1 established in Step 3, we can then determine the intermediate ratings of 2 through 5. The regulations require that we divide this range into equal fuel consumption intervals. Doing so results in the following divisions between ratings, shown in both consumption and rounded miles per gallon:

Rating	Lower limit (gal/mi)	Lower limit (MPG)	Upper limit (MPG)
5	0.04372	23	28
4	0.05271	19	22
3	0.06187	16	18
2	0.07095	14	15
1	0.00000	--	13

### **Step 6: Determine GHG ratings**

The regulations specify that the GHG ratings will be determined from the MPG ratings using the conversion factor of 8887 grams of CO<sub>2</sub> per gallon of gasoline. Carrying out this operation on the values determined above yields the following complete set of fuel economy and greenhouse gas ratings for 2026 model year vehicles:

<b>Rating</b>	<b>MPG</b>		<b>GHG</b>	
	<b>≥</b>	<b>≤</b>	<b>≥</b>	<b>≤</b>
10	121	--	0	74
9	67	120	75	134
8	47	66	135	191
7	36	46	192	250
6	29	35	251	312
5	23	28	313	395
4	19	22	396	480
3	16	18	481	573
2	14	15	574	658
1	--	13	659	--