



OFFICE OF AIR AND RADIATION

WASHINGTON, D.C. 20460

July 21, 2025

IACD-2025-07 (LDV, LDT, ICI, LIMO)

SUBJECT: Plug-in Hybrid Electric Vehicles (PHEVs) and Fuel Economy Data Submission

Dear Manufacturer:

The purpose of this letter is to encourage manufacturers to follow a consistent practice in submission of required fuel economy label data for plug-in-hybrid electric vehicles (PHEVs) to the EPA.

Under 40 CFR Part 600, manufacturers of light- and medium-duty vehicles are required to generate and submit fuel economy label data for the vehicles that they intend to offer for sale. As of the time of writing, the Electronic Vehicle Certification Information System (EVCIS) is not configured to accept complete fuel economy data for PHEVs, which require additional testing under 40 CFR 600.210-12(c)(1)(iv) compared to a conventional internal combustion vehicle.

To aid manufacturers in calculating PHEV fuel economy, and to provide a method via which manufacturers may submit complete PHEV fuel economy data to the Agency, we have published a 'EPA Plug-In Hybrid Electric Vehicle Calculator' spreadsheet, available in .xlsm format from [Certification and Fuel Economy for Light-Duty Passenger Cars and Trucks](#). All manufacturers are encouraged to use this tool to ensure consistent data submissions and timely EPA review of PHEV fuel economy label data.

All manufacturers should use the following naming scheme and submission practices for the calculator spreadsheet to enable prompt EPA access and review.

The EPA Plug-In Hybrid Electric Vehicle Calculator spreadsheet should be submitted to complianceinfo@epa.gov.

The file should be named as follows:

"Model Year" + "_" + "Division Name" + "_" + "Model Type Name" + "_" +
"Manufacturer Code" + "_" + "Model Type Index" + ".xlsm"

For example, an EPA Plug-In Hybrid Electric Vehicle Calculator with data for the 2025 Lamborghini Urus SE should be named as follows:

Begin with:

"2025" + "_" + "Lamborghini" + "_" + "Urus SE" + "_" + "VGA" + "_" + "410" + ".xlsm"

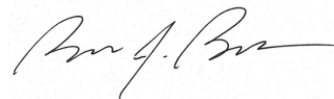
Leading to:

"2025_Lamborghini_Urus SE_VGA_410.xlsm"

As a second example, the 2025 Mercedes-Benz GLE 450 e 4MATIC vehicle calculator spreadsheet should be named "2025_Mercedes-Benz_GLE 450 e 4MATIC_MBX_407.xlsm".

Submitting the EPA Plug-In Hybrid Electric Vehicle Calculator as specified above and following this naming scheme will assist EPA employees with the timely review of PHEV fuel economy data and help prevent data loss. If you have questions, please reach out to Joshua Kimball (kimball.joshua@epa.gov) or Hannah Frame (frame.hannah@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Byron Bunker", is positioned above the typed name.

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