



General Motors

General Motors LLC
Compliance & Certification
MC 483-331-500
Milford Proving Ground
3300 General Motors Road
Milford, Michigan 48380-3726

June 29, 2018

GM1402

Mr. Christopher Grundler
Director, Office of Transportation and Air Quality
EPA National Vehicle and Fuel Emissions Laboratory/OAR
2565 Plymouth Road
Ann Arbor, MI 48105

Dear OTAQ Director Grundler:

Subject: GM Fuel Economy Test Fuel Plan for 2020 and Subsequent Model Years

This letter is to notify the United States Environmental Protection Agency (EPA) that General Motors Company (GM) will continue to use Tier 2 (E0) test fuels in accordance with the interim provisions at 40 C.F.R. § 600.117 for Corporate Average Fuel Economy (CAFE) and greenhouse gas (GHG) development and certification testing and labeling for MY2020. This is consistent with EPA's intent to allow manufacturers "to continue to test for CAFE, GHG, and labeling purposes on Tier 2 test fuels for each ... FEDV until such time as EPA determines appropriate adjustments, if any, related to a change to Tier 3 test fuels."¹ GM will continue to use E0 test fuel and follow the interim provisions for development and certification of subsequent model year vehicles "until the future action mentioned above takes effect."²

Sincerely,



Jeffrey Wrona
Executive Director, Certification and Compliance
General Motors Company

c: William Wehrum, Assistant Administrator

¹ Control of Air Pollution from Motor Vehicles: Tier 3 Motor Vehicle Emission and Fuel Standards; Final Rule, 79 Fed. Reg. 23414, 23531 (Apr. 28, 2014).

² *Id.* at 23532.