

## **bp response: Road fuel monitoring – consultation on draft guidance for information gathering powers**

### **Introduction**

bp is a leading global energy company – our strategy is to transition from an international oil company to an integrated energy company delivering solutions for our customers.

bp has been based in the UK for more than 100 years and operates in over 70 countries around the world. We have a primary listing on the London Stock Exchange and a secondary listing in the US, on the New York Stock Exchange.

In our recently published UK Economic Impact Report for 2023, Oxford Economics found that in 2023:

- bp’s direct contribution plus the impact of our supply chain spend supported £17.1bn in gross value-added (GVA) contributions to UK GDP
  - Equivalent to 0.64% of UK GDP.
- In addition, bp paid and collected £4.3 billion in tax to the UK and devolved governments
- bp supported around 81,000 jobs both directly and indirectly through the supply chain across the UK
  - In total, that equates to 1 in every 410 UK jobs
  - Of this number, around 16,049 people were employed directly by bp in the UK.
- bp spent £5.3bn with UK suppliers. This procurement, combined with bp’s spending elsewhere around the world, was spent with:
  - over 2,600 suppliers of operational goods and services, and
  - over 540 suppliers of capital goods and services.
  - The suppliers were spread across 521 UK constituencies.

### **Key points**

- bp agrees that the frequency of reporting seems reasonable; however, it is not entirely clear at this stage what or how much information will be required, nor the format in which it will need to be submitted and accordingly how much resource will be required
- To ensure consistency of data, a draft template should set out the information that will be requested - along with clear definitions of each item - and shared with industry to ensure that all respondents interpret the data request in the same way
- The CMA must ensure that the data which is commercially sensitive is kept confidential and secure

### **Consultation Questions:**

1. **Do respondents agree with the proposed approach that ongoing information requests should cover:**

- I. **Supermarkets**

- II. **Motorway retailers with five or more sites**
- III. **Other retailers with 80 or more PFS sites across their group? If not, who do you believe the CMA should be requesting information from.**

This approach seems proportionate and to cover the majority of petrol filling stations in the UK, but assurance is needed that the data captured by the respondents in scope is a true reflection of the road fuels market.

- 2. **Do respondents agree with the proposal for retailers to submit monitoring information to the CMA on a quarterly basis rather than more frequently? If not, please detail your preferred reporting frequency and why.**

bp agrees that submitting monitoring on a quarterly basis seems reasonable. However, at this stage it is not clear what, how much information will be required, nor the format in which it will need to be submitted - and accordingly how much resource and time will be needed to provide information.

- 3. **Do respondents agree that data required for a specific month or quarter should be provided by the 15<sup>th</sup> day of the second month following that period? If not, please explain your preferred timing of submissions and why.**

Providing data in a specified format will require extra resource and cost but without knowing exactly what data will be required, it is hard to draw a conclusion as to how reasonable this time frame is. Please also see our answer to question four.

- 4. **Are there any other issues or information the CMA should include in the guidance we will publish on exercising our information gathering powers for our motor fuel monitoring function.**

It is currently unclear what information the CMA will request and in what format. bp is of the view that the CMA should share a draft template for industry feedback, which sets out the data that will be asked for with clear definitions of each item – to ensure that all respondents interpret the data request in the same way. This will ensure the information provided to the CMA is robust and reliable. Sharing a draft template in advance would allow petrol retailers to seek clarity on any aspects of the future data requests that are unclear, and which will also ensure that all retailers are submitting information which can result in a like for like comparison.

- 5. **Do respondents agree that an online portal should be set up and used as a way for retailers to submit data for the road fuel monitoring function? If so, are there any particular features you would like the CMA to consider, if it is developed?**

The CMA must ensure that the data which is commercially sensitive is kept confidential and secure. Furthermore, data should only be accessed by individuals who require access to it for the purpose intended.

The portal must be designed in a way that those submitting information only have access to their own data. In line with our answer to question four, it would be helpful if industry engagement could be undertaken before the data request is initiated, to ensure any requests for information have been interpreted correctly and consistently, before the CMA publishes reports.

ENDS