

Respondent D

From: [✂]¹

Sent on: Friday, October 17, 2025 2:51:52 PM

To: RoadFuel.Monitoring <RoadFuel.Monitoring@cma.gov.uk>

Subject: kWh?

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Primary reason for responding:

Given that the consultation refers (page 3, paragraph 4) to "the UK transitions to net zero", it would seem short-sighted to include only petrol and diesel (cost per litre); any such scheme should also cover the cost (per kWh) [and availability, as with the fuels] of charging, where provided for public use. (Other fuels/methods - such as hydrogen and LNG - should also be considered, and brought into the process should they ever become used on a wider scale, but probably not yet.)

Omission of such pricing from the process would be shortsighted, and provide (additional) discouragement to the use of EVs.

Other considerations, for completeness:

I have my usual reservations - re "the digital divide" and similar: that benefitting from this scheme may once again be limited to those with "smartphones" (and the consequent always-on data contract); however, I cannot at the moment think of any way round this. Nevertheless, such consideration should not be permanently dismissed: should some means of wider accessibility become possible, it should be investigated.

Enforcement: Only "Reporting of breaches by the aggregator" (page 16) is mentioned; there should also - in any document, legislation, etc. - be a description of how _any_ member of the general public may report same, even if only to the "aggregator". [A webform may be appropriate, as that makes it easier to ensure necessary information (such as how the infringement was detected) is gathered.]

Paragraph 18 on page 17: "Before proposing any enforcement action in relation to a breach, the CMA will typically ensure that the MFT involved is aware of the breach and has had an opportunity to liaise with the CMA to rectify the breach." This conflicts with "provide their fuel prices within 30 minutes of a change" (page 3 paragraph 5); if provision is to be made to allow rectification, then the 30 minutes period is clearly not going to be enforced. This discrepancy needs addressing.

Penalties (Annex B): the general tone of the annex appears to be to consider large companies (e. g. mentions of "worldwide turnover"), and in general implies a lengthy process; while such penalties could be assumed to "trickle down", I feel there should also be consideration of more rapid application to individual retailers, especially independents (who may be more likely to breach, possibly unintentionally). Remember, the _intention_ of the scheme is to ensure rapid and up-to-date access of information to customers; any process involving weeks of administrative action is of no use to the customer, who needs it rectified ideally within the hour, or at most a day. The Annex is in danger of "drowning in detail" rather than aiding rapid remedy of a breach.

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¹ The CMA has marked up (with a scissors symbol) where we anticipate that the respondent would consider material sensitive and for redaction.