

Emailed to: [heatingoil@cma.gov.uk](mailto:heatingoil@cma.gov.uk)

9 April 2026

## **The Competition and Markets Authority (CMA) Heating oil Market Study**

Thank you for the opportunity to comment on the market study into the retail supply of fuel for use in domestic central heating systems.

### **Q2: Do you agree with our articulation of the characteristics of a well-functioning heating oil market as set out in paragraphs 9 and 10? If not, what should be changed, and why?**

We agree with how CMA has defined a well-functioning market. We agree that consumers can benefit from having a choice of supplier with regards to price and service quality and that suppliers are incentivised to treat their consumers fairly. We agree that pricing practices should be reasonable and transparent to help inform consumer choice. We strongly agree that appropriate consumer protection measures should be in place.

### **Q3: Do you consider that the heating oil market currently displays the characteristics of a well-functioning market as set out in paragraphs 9 and 10? If not, please explain why you consider this to be the case, what is driving this, and how this could potentially be addressed.**

We think that consumer trust and confidence in a sector improves through a combination of regulation, advice, advocacy and redress, similar to that which exists in the gas and electricity supply market, which is regulated by Ofgem, Citizens Advice as the consumer advocacy body and Energy Ombudsman as the single redress provider.

We see complaints from consumers who have oil as their primary source of heating and expect to have lower electricity usage but still receive high electricity bills.

We know that many consumers are or will be using a range of energy sources, products and services to help them warm their homes and it can be confusing. We have been reviewing the energy landscape to help us understand the various products and services and their associated consumer protections; we think there is, at best, a patchwork of consumer standards, codes and redress, and at worst significant gaps in consumer protections.

We agree with the Statement of Scope document which highlights that consumers have no access to mandatory independent alternative dispute resolution (ADR) or ombudsman. We think this is a key requirement and it should be a single ombudsman provider. This ensures a simpler and more consistent complaint journey for consumers – plus the ombudsman model (as opposed to ADR) can provide insight on complaints across the whole sector. This can be used to help

heating oil providers to make improvements to their service and with policy makers and other key stakeholders to improve standards more generally, building consumer trust in the sector.

**Q5: Are there any specific areas we should focus on because they have the potential to disproportionately affect vulnerable consumers?**

Depending on the heating source, product or service, there can be different consumer complaint handling journeys with varying levels of support and guidance for consumers. We think that all consumers benefit when consumer journeys are streamlined, consistent and accessible.

We also believe that heating oil consumers are more at risk, particularly during cold weather to be without a source of heat due to the nature of oil deliveries and the additional pressures that fall on providers when weather conditions prohibit deliveries from taking place. Consumer redress that considers consumers with additional, more complex needs is even more critical in this market.

We also have further information and insight that we have been working on and would be happy to share that with the CMA if that would be helpful. Please do not hesitate to contact us should you wish to discuss our response in more detail. Our response is not confidential.

**For more information on this response, please contact:**

[REDACTED]  
[REDACTED]