

CNE ANNOUNCES THE IMPLEMENTATION OF A TEMPORARY REGISTRATION PROGRAM FOR THE DISPATCH FOR SELF-CONSUMPTION OF PETROLEUM PRODUCTS.

On July 21, 2026, the National Energy Commission (the “**CNE**”) published the Press Release No. 008, announcing the implementation of a temporary Registration Program for the Dispatch for Self-Consumption of Petroleum Products (the “**Program**”).

The Program is intended to identify existing facilities used by private parties for the receipt, storage, and supply of Petroleum Products (e.g., gasoline, diesel, liquefied petroleum gas, etc.), as well as to strengthen the traceability of operations and establish a transitional mechanism for individuals currently engaged in the Dispatch for Self-Consumption of Petroleum Products until the CNE issues the corresponding regulations governing such activity.

The following is a summary of the Program’s main aspects.

I. Background

The Hydrocarbons Sector Law (the “**LSH**”), published on March 18, 2025, introduced the concept of the Dispatch for Self-Consumption of Petroleum Products for the first time.

Subsequently, the Regulations of the Hydrocarbons Sector Law (the “**RLSH**”) defined it as the activity consisting of receiving, storing, and supplying Petroleum Products intended exclusively for refueling motor vehicles owned by or in the possession of the license holder, directly related to their economic activity or corporate purpose. Furthermore, the RLSH expressly prohibits the sale, assignment, or transfer of these products to third parties and stipulates that the activity must be carried out at facilities that comply with the requirements established by the CNE and the National Agency for Industrial Safety and Environmental Protection in the Hydrocarbons Sector.

II. Key Aspects of the Program

Although the LSH and the RLSH recognize this activity, to date, there are no applicable administrative regulations for obtaining the corresponding permit. In this context, the Program serves as a transitional mechanism until the CNE issues the regulations applicable to this activity.

According to the CNE’s press release, the following points are noteworthy:

- **Temporary Registration.** In the coming weeks, the CNE will publish a Registration Program aimed at individuals who currently operate facilities intended for Dispatch for Self-Consumption.
- **Transitional Mechanism.** The registration will allow the activity to continue while the final permit is being processed; this permit will be regulated by the rules issued by the CNE for this purpose.
- **Traceability.** The Program aims to identify existing facilities and strengthen the control and traceability of the supply of Petroleum Products for self-consumption.

Companies currently conducting Dispatch for Self-Consumption of Petroleum Products should follow the publication of the Program and assess whether their operations fall within its scope, in order to apply for temporary registration and timely comply with the obligations established by the CNE as it issues the applicable regulations.

At Von Wobeser y Sierra, we are available to assist you in analyzing this new regime applicable to the Dispatch for Self-Consumption of Petroleum Products, as well as in evaluating the implications arising from this Program and assisting with compliance with future regulations. If you require additional information, please do not hesitate to contact our partners and associates who are experts in this field.

For more information, please contact:

Ariel Garfio, Partner:

+52 (55) 5258-1007 | agarfio@vwys.com.mx

Edmundo Berumen, Associate:

+52 (55) 5258-1007 | eberumen@vwys.com.mx

Mauricio Puebla, Associate:

+52 (55) 5258-1007 | mpuebla@vwys.com.mx

Regina González, Associate:

+52 (55) 5258-1007 | rgonzalez@vwys.com.mx

Arturo Hernández, Associate:

+52 (55) 5258-1007 | ahernandez@vwys.com.mx

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VON WOBESER Y SIERRA, S.C.

Mexico City, July 29, 2026.

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