

# CNE ISSUES RESOLUTION ESTABLISHING THE TEMPORARY REGISTRATION PROGRAM FOR THE DISPATCH OF PETROLEUM PRODUCTS FOR SELF-CONSUMPTION

On August 11, 2026, the National Energy Commission ("**CNE**") published in the Federal Official Gazette ("**DOF**") the Resolution establishing the Registration Program for persons with facilities where petroleum products are dispatched for self-consumption (the "**Resolution**").

The Resolution establishes a temporary and exceptional registration mechanism designed to identify and temporarily authorize persons currently engaged in this activity without a permit (the "**Registration Program**"). The purpose of this mechanism is to allow such persons to continue their operations during the transition to the permitting regime, subject to: (i) compliance with certain registration requirements; and (ii) the CNE's supervisory, verification, and enforcement powers. Under the Registration Program, persons that obtain the corresponding registration certificate (the "**Certificate**") may continue engaging in the dispatch of petroleum products for self-consumption ("**Dispatch for Self-Consumption**") during the transitional period provided for in the Resolution.

## A. Background

Pursuant to the Regulations of the Hydrocarbons Sector Law, Dispatch for Self-Consumption consists of receiving, storing, and supplying petroleum products exclusively to motor vehicles that are owned or in possession of the interested persons and are directly related to their economic activity or corporate purpose, without the possibility of selling such products to third parties.

The Registration Program seeks to prevent the abrupt disruption of operations in essential economic sectors —such as transportation, agriculture, and mining— that rely on facilities for Dispatch for Self-Consumption. At the same time, it aims to facilitate the gradual integration of these operations into the new regulatory framework established by the CNE.

## B. General Overview of Requirements

To obtain the Certificate under the Registration Program, interested persons must complete an electronic form before the CNE and submit, among other things, the following technical and operational information and documentation:

- **Technical information on the facilities:** A georeferenced site plan indicating the location of the facility; a description of the type and capacity of the storage tanks; and the number and configuration of the dispensing systems. Additionally, applicants must submit a plan or technical memorandum describing the length of time the facility has been in operation, together with photographic evidence of its current condition.
- **Operational information:** A detailed inventory of the motor vehicles to be supplied, including type, serial number or vehicle identification number (VIN), and license plate number. Applicants must also provide the total annual volume of petroleum products used for Dispatch for Self-Consumption during 2024, 2025, and 2026, broken down by month and product type, expressed in liters.

- **Evidence of lawful origin:** Information regarding the relevant Marketers or Distributors (permit number and Federal Taxpayer Registry number (RFC)), together with the three most recent invoices issued, to evidence the commercial relationship and the lawful origin and traceability of petroleum products.
- **Statements under oath:** Declarations attesting, among other matters, to compliance with the applicable regulatory framework; the lawful origin of the petroleum products; and confirmation that the facility is not subject to any ministerial or judicial investigation or seizure in connection with the alleged commission of a criminal offense.

### **C. Obligations of Marketers and Distributors**

The Resolution also establishes obligations for holders of Distribution and Marketing permits that supply petroleum products to persons engaged in Dispatch for Self-Consumption. During the transitional period, they may only conduct commercial transactions with persons holding a valid Certificate under the Registration Program.

To facilitate compliance, the CNE will publish and maintain an updated list on its official website of all persons registered under the Registration Program, enabling Distributors and Marketers to verify the validity and current status of the corresponding Certificates before engaging in commercial transactions.

### **D. Registration Program Period**

The Resolution provides that the registration period under the Registration Program began on August 12, 2026, and will end, without extension, on December 31, 2026. Once this period has ended, the CNE will have a maximum of 12 calendar months to issue the final regulations governing the granting of permits for Dispatch for Self-Consumption. The Resolution further provides that such regulations may establish mechanisms to give priority to permit applications submitted by persons registered under the Registration Program.

### **E. General Conclusions**

Persons currently engaged in Dispatch for Self-Consumption without the corresponding permit should assess whether their facilities fall within the scope of the Registration Program and, if applicable, register no later than December 31, 2026.

It is important to note that the Certificate does not constitute a permit, authorization, or favorable determination as to the lawfulness of the underlying activity. Rather, it temporarily authorizes registered persons to continue engaging in Dispatch for Self-Consumption during the transitional period provided for in the Resolution, subject to the CNE's ongoing supervisory and enforcement powers. Once the final regulations are issued, registered persons will be required to apply for a Dispatch for Self-Consumption permit in accordance with the terms and deadlines established therein. Failure to obtain the corresponding permit may result in administrative sanctions and the suspension of operations.

Von Wobeser y Sierra remains available to assist you in analyzing this new regulatory framework applicable to Dispatch for Self-Consumption, assessing the implications arising from the Registration Program, and complying with the applicable regulations. Should you require any additional information, please do not hesitate to contact our partners and associates with expertise in this area.

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