

SENER ISSUES AN AMENDMENT TO THE GUIDELINES FOR THE VOLUNTARY MIGRATION OF ELECTRICITY SELF-SUPPLY AND COGENERATION PERMITS.¹

On June 18, 2026, the Ministry of Energy ("**SENER**") published in the Official Gazette of the Federation ("**DOF**") the *"Agreement Issuing the Guidelines for the Voluntary and Expedited Migration of Self-Supply and Cogeneration of Electricity to the Provisions Set Forth in the Electricity Sector Law"* (the "**Guidelines**"), whose The objectives, scope, and specifications of the Guidelines can be found in the legal notice "Guidelines for the Voluntary Migration of Legacy Permits to the Current Electricity Regime Take Effect".

In order to provide legal certainty to applicants and to continue the relevant procedures, on September 8, 2026, SENER published the *"Agreement Amending, Eliminating, and Adding Various Provisions to the Guidelines for the Voluntary and Expedited Migration of Self-Supply and Cogeneration of Electricity to the Categories Provided for in the Electricity Sector Law"* (the "**Amendment to the Guidelines**") in the DOF.

Below is an executive summary of the most relevant aspects set forth in the Amendment to the Guidelines:

A. Main amendments.

The purpose of the Amendment to the Guidelines is to extend the dates and deadlines set forth in the Migration Procedure timelines outlined in the Guidelines and to simplify the technical, contractual, and operational requirements originally established in order to promote the voluntary migration of electricity self-supply and cogeneration permits granted under the Public Electric Power Service Law (the "**LSPEE**"), together with the contracts and agreements related thereto and the Load Centers associated with those permits, to the entities provided for in the Electricity Sector Law ("**LSE**"). The main amendments are as follows:

1. Greater flexibility in technical and contractual requirements

- Connection Studies: Local loads seeking to migrate in order to receive Qualified Supply must request connection studies from the National Energy Control Center ("**CENACE**") before submitting the corresponding migration request. CENACE will give priority attention to such requests.
- Storage Systems: The requirement to submit a feasibility study for integrating an electric energy storage system at the time of filing the migration request has been eliminated. These studies may be requested in conjunction with the migration request or, alternatively, applicants may provide proof that the process is underway in order to receive priority consideration from CENACE.
- Validity of Generation Permits: For power plants in operation, the validity of the generation permit may be extended for up to fifteen years, without exceeding a total of thirty years, subject to the submission to, and evaluation by, the National Energy Commission ("**CNE**") of a Modernization Program that demonstrates the plant's reliable, efficient, and safe operation.

1. Capitalized terms used in this document that are not expressly defined herein shall have the meanings assigned to them in the Guidelines and/or the Amendment to the Guidelines.

2. Implementation of the procedure, continuity of supply, and metering

- Advance Scheduling and Flexibility in Minimum Operational Tests: Applicants may propose earlier dates for conducting Minimum Operational Tests upon submitting the migration request and may modify the schedule with CENACE's prior authorization.
- Guarantee of continuity of Basic Supply: The commencement or, where applicable, the non-completion of the Migration Procedure does not interrupt the Basic Supply service. For self-consumption schemes, the Basic Supply contract does not automatically terminate and may be retained as a backup to meet demand not covered by the Power Plant associated with the self-consumption scheme.
- Retention of metering infrastructure:
- Demand < 1 MW: Participants may retain their current metering equipment, provided that it complies with the Minimum Required Metering Functionality.²
- MEM Participants: The use of existing metering system components is authorized, provided that they comply with the Market Rules, regardless of ownership. The cost of modifications and subsequent maintenance following failures shall be borne by the user of the corresponding metering system.
- Shared Substations and Asset Registration: The regulation expressly addresses the scenario in which multiple Load Centers are connected to a shared substation. This requires the execution of an agreement for the shared use of the substation and individualized metering for each Load Center.

3. Changes to schedules and deadlines

- General extension of deadlines: The deadlines for completing initial stages, addressing preventive measures, issuing resolutions, inspecting metering equipment, and formalizing contracts have been significantly extended.
- Deadline and option for early authorization: **October 6, 2028**, is confirmed as the general deadline for the completion of joint migration procedures and those for Power Plants. However, those intending to operate in the MEM before **May 14, 2027** have the option to formally waive the Migration Procedure schedule to pursue "Authorized" status through standard procedures.
- Transition period (10 business days): Applicants who submitted expressions of interest or applications prior to the publication of the Amendment to the Guidelines will have 10 business days from the date on which the Amendment takes effect to confirm with the Migration Desk their intention to continue with the Migration Procedure in accordance with the deadlines in effect at the time of their submission; otherwise, they will automatically be subject to the new timeline.
- Legal accreditation with the CNE: It is essential to verify the legal status of the represented party and its authorized representatives with the CNE's Electronic Filing Office before beginning the fourth stage of the procedure.

B. Timeline applicable to Power Plants and joint migrations.

To provide clarity regarding adjustments to the procedure's deadlines, the following table sets out the updated schedule under the Amendment to the Guidelines and reflects the extension of the corresponding deadlines and terms:

2. This includes the measurement of electrical energy using a five-minute profile, a communication system operating continuously, and, when applicable, instrument transformers, all of which must be operational.

Dates	Stages	General Description
June 19 to December 18, 2026	Expression of interest	Submission of the expression of interest to participate in the Migration Process.
September 21, 2026, to January 15, 2027	Submission of the migration request	Formal submission of the request by the interested party.
January 18 to February 19, 2027	Review of migration requests and issuance of deficiency notice	Single deficiency notice.
February 22 to March 12, 2027	Response to a deficiency notice, if issued	Submission of clarifications or requested information.
January 18 to March 26, 2027	Analysis of the request	Acceptance and review of the request, with or without a deficiency notice, as applicable, or rejection.
March 29 to May 14, 2027	Resolution and permit issuance	Decision by the CNE Technical Committee to exclude Load Centers from the Legacy Categories, issuance of the corresponding permit, and registration in the Qualified Users Registry.
January 18 to May 14, 2027	Metering review and confirmation of compliance	Technical review of metering systems at Power Plants and Load Centers and issuance of confirmation of compliance.
May 17 to June 4, 2027	Preliminary registration of physical assets	Initial registration with CENACE of the Power Plant (by the Generator) and of End Users (by the Supplier).
May 17, 2027, to August 17, 2028	Compliance with conditions	Demonstration of compliance with regulatory requirements and performance of Minimum Operational Tests.
October 1, 2027, to April 28, 2028	Conducting minimum operational tests	Conducting Minimum Operational Tests to verify the proper technical and operational integration of the asset.
August 18–31, 2028 Legacy Assets with no evidence of having entered commercial operation: May 17 to June 4, 2027	CENACE's instruction to the CFE	Issuance of the formal CENACE instruction to the CFE to proceed with the signing of the new interconnection/connection contracts and the consequent early termination of the Legacy Contracts and related agreements.
September 4 to October 6, 2028 Legacy Assets with no evidence of having entered commercial operation: June 7 to July 2, 2027	Formalization of contracts and termination of Legacy Contracts	Formalization of the new interconnection/connection contract, early termination of the Legacy Contracts and related agreements, as well as the exclusion of Load Centers.
October 6, 2028	"Enabled" status, commencement of operations in the MEM, and conclusion	Change in status to "Enabled," commencement of operations in the MEM, and formal notification from CENACE to the Market Participant, Transmitter, or Distributor to conclude the procedure.
May 17, 2027, to August 17, 2028	Compliance with Metering System requirements	Accreditation and final compliance with the technical specifications and requirements for Metering Systems.

C. Schedule applicable to Load Centers.

With regard to the procedure applicable to Load Centers, the Amendment to the Guidelines extends the initial and resolution stages, while modifying the deadlines for formalizing the connection contract and advancing the registration of physical assets under the "Enabled" status. The corresponding terms and stages are detailed below:

Dates	Stages	General Description
June 19 to December 18, 2026	Expression of interest	Submission of the expression of interest to participate in the Migration Process.
September 21, 2026, to January 15, 2027	Submission of the migration request	Formal submission of the request by the applicant.
January 18 to February 19, 2027	Notification of deficiency notices	Review of applications and notification of deficiency notices.
February 22 to March 12, 2027	Response to any deficiency notices that may be issued	Response to any deficiency notices, if issued.
January 18 to March 26, 2027	Acceptance and review of the request	Review of the request, issuance of deficiency notices, or dismissal.
March 29 to May 14, 2027	Decision on the exclusion of Load Centers and registration in the RUC	Issuance by the CNE of the decision regarding the exclusion of Load Centers from the Legacy Categories and, where applicable, their registration in the RUC.
January 18 to May 14, 2027	Verification of measurements	Technical inspection and functional verification of metering systems.
May 17 to June 4, 2027	Instruction from CENACE to the CFE to formalize the connection contract	Instructions to formalize the connection contract with the CFE, terminate the Legacy Contracts and related agreements early, and exclude the Load Center.
June 7 to July 2, 2027	Formalization of the new connection contract	Signing of the connection contract, early termination of the Legacy Contracts and related agreements, and exclusion of the Load Center.
July 5 - 23, 2027	"Enabled" status and completion	Change in status to "Enabled," commencement of operations in the MEM, and notification from CENACE.
May 17, 2027, to August 17, 2028	Compliance with Metering Systems requirements	Accreditation and compliance with requirements related to Metering Systems as set forth in the Guidelines.

At Von Wobeser y Sierra, we are here to assist you in analyzing and implementing the changes resulting from the Amendment to the Guidelines. If you require additional information, please do not hesitate to contact our partners and associates who are experts in this field.

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