

## Mexico: Draft guidelines for the migration to the schemes of the new Electricity Sector Law

December 2025

**Through this regulation, the Ministry of Energy (SENER) seeks to facilitate the voluntary migration to the current schemes contained in the Electricity Sector Law (LSE) of permits granted under the Electricity Public Service Law (LSPEE), as well as related contracts, agreements, and associated load points.**

On December 5, 2025, the National Commission for Regulatory Improvement (CONAMER) published on its website the draft issued by SENER regarding the “Guidelines for the voluntary and prompt migration of Self-Supply, Cogeneration, and Independent Production to the schemes of the Electricity Sector Law.” These guidelines are intended to regulate the prompt process for the voluntary migration of the aforementioned permits granted under the LSPEE regime to the new schemes provided for in the LSE.

### Incentive for the importation and acquisition of diesel fuel

Notifications regarding the corresponding migration process must be made through the specific single window system.

Activities carried out under self-supply, cogeneration, or independent production (legacy schemes) that are in force at the time of the migration request may continue without interruption during the migration procedure and until its conclusion.

In the context of migration, to the granting of permits the provisions on binding planning in the activity of electricity generation are not applicable, as this involves the migration of previously granted permits.

The generation permit granted under the LSE must have a maximum validity of 15 years, plus whatever is the remaining validity of the permit to be migrated, without exceeding 30 years.

In turn, the migration procedure must not consider any requests for technical modifications to the power plants or load points subject to migration.

### Migration

In accordance with the draft guidelines, migration is voluntary, total, and definitive, and implies the express waiver of legacy schemes and, as a consequence, their early termination upon fulfillment of the applicable obligations and requirements.

Power plants with two or more permits for the same facility must migrate their entire capacity to a single permit, without this being considered an increase in generation capacity, i.e., partial migrations do not apply.

For their part, end users with load points included in the legacy schemes may choose to migrate as a qualified user to receive the qualified supply or maintain the basic supply.

Legacy schemes must migrate to one of the following generation figures provided for in the LSE:

- i. Isolated self-consumption.
- ii. Interconnected self-consumption.
- iii. Generation for the Wholesale Electricity Market (MEM).
- iv. Generation for the MEM under the long-term production scheme.

For the case of independent production permits, these must necessarily migrate to the MEM generation model under the long-term production scheme.

Specifically, the draft guidelines establish the modalities under which migration can be requested:

Modality	Description
<b>i. Power plant migration</b>	Applicable to a power plant operating under any of the legacy figures.
<b>ii. Joint migration of power plant and load points for the granting of an electricity generation permit for the MEM.</b>	Applicable when migrating jointly and with coordinated dates. The power plant must be represented in the MEM by a market participant in the generator modality, and the load points must apply to register as qualified users and be represented by a market participant in the qualified service supplier modality.
<b>iii. Migration of end users with load centers as qualified users.</b>	Applicable to load points whose individual or aggregate demand is greater than or equal to 1 MW that migrate to obtain registration as a qualified user.
<b>iv. Migration of end users with load centers to basic supply.</b>	Applicable to load centers that are supplied by power plants included in legacy permits and that, when applying for migration, request to maintain basic supply.
<b>v. Joint migration of power plant and local loads for the granting of a permit for the generation of electricity for interconnected self-consumption.</b>	Applicable to a power plant and local loads associated with the legacy scheme that migrate jointly and on coordinated dates, and that apply for an electricity generation permit for interconnected self-consumption with at least one self-consumption user (the corresponding connection and interconnection instruments must be formalized).
<b>vi. Joint migration of power plant and local loads for the granting of a permit for electricity generation for isolated self-consumption.</b>	Applicable to a power plant and local loads associated with the legacy scheme that migrate jointly and on coordinated dates, and that request the granting of a permit for electricity generation for isolated self-consumption with at least one self-consumption user.

## Migration process

The migration process comprises the following stages:

- i. **First stage:** registration of interest in participating in the migration process, through the specific single window system.
- ii. **Second stage:** submission of the migration application (using the authorized form with the applicable requirements).
- iii. **Third stage:** sole deficiency notice and, where appropriate, acceptance or rejection of the application, as applicable.
- iv. **Fourth stage:** resolution by the CNE Technical Committee and, where appropriate, granting of the permit, as well as registration in the register of qualified users and exclusion of load centers from the legacy scheme, depending on the migration modality.
- v. **Fifth stage:** formalization of the interconnection contract or connection contract, and early termination of legacy contracts and related agreements, as well as exclusion of load centers from legacy contracts.

In the case of migration from independent production permits to the generation for the MEM under the long-term production scheme, the corresponding long-term production contracts must be formalized.

- vi. **Sixth stage:** review of the measurement functionality of power plants and load points by the transmission service provider or distributor, and issuance of results.
- vii. **Seventh stage:** registration of physical assets by the market participant. In the case of power plants, when registering physical assets, the status of “enabled” and the date of entry into commercial operation are declared. In the case of load points, when registering physical assets, supply activities begin in the corresponding mode, whether qualified supply or basic supply.
- viii. **Eighth stage:** conducting operational tests for migration and compliance with conditions for power plants and load points.

For the case of power plants that are not in operation, as well as in cases of migration to electricity generation permits for isolated self-consumption, only stages one through four are applicable.

In general, applicants who may submit the registration of interest in migrating and the application for the migration process, jointly or individually, on their own behalf or through their representatives, are:

- a. The holders of permits, contracts, or agreements related to them, with respect to any of the legacy schemes.
- b. End users with load points that are members of self-supply entities and establishments associated with cogeneration, of the legacy schemes.

To this end, they may designate accredited individuals, as appropriate, the market participant in the capacity of generator; the market participant in the capacity of qualified service supplier; and the Federal Electricity Commission (CFE) as a basic service provider.

In this regard, the migration single window system is the only means for processing migration requests, in order to ensure administrative simplification and technical agility. It is available at the following web address: <https://ventanillaunica.energia.gob.mx>.

Finally, applicants who have requested migration to the figures of the Electricity Industry Law or the LSE prior to the publication of the guidelines must ratify the request through the migration single window system with the registration of the statement of interest.

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