

Mexico: SENER advances the transition of legacy self-supply projects into the new electricity market through an expedited migration regime



June de 2026

Mexico's Ministry of Energy (SENER) has issued new regulations aimed at facilitating the voluntary migration of self-supply (autoabastecimiento) and cogeneration permits originally granted under the former Public Electricity Service Law (LSPEE), together with the related contractual arrangements and associated load centers, into the legal and commercial structures established under the Electricity Sector Law (LSE).

On June 18, 2026, SENER published in the Official Gazette of the Federation (DOF) the following instruments relating to projects and permits issued under the LSPEE framework:

The Guidelines for the voluntary and expedited migration of self-supply and cogeneration projects to the regulatory structures established under the Electricity Sector Law; and

The Resolution of the National Energy Commission establishing the methodology for calculating the transmission service charge applicable to permit holders operating generation plants under LSPEE permits and benefiting from interconnection agreements and transmission service arrangements executed pursuant to the former legal regime.

Guidelines for the migration of self-Supply and Cogeneration Projects

The purpose of the guidelines is to regulate the procedure for the voluntary and expedited migration of self-supply and cogeneration permits granted under the LSPEE, together with the contracts, agreements and associated load centers linked to such permits, into the regulatory categories established under the LSE.

To achieve this objective, the guidelines establish a dedicated migration process implemented through a temporary and exceptional migration program, designed to be administered under principles of administrative simplification and technical efficiency.

The guidelines apply to holders of self-supply or cogeneration permits with generation capacity equal to or greater than 0.7 MW; and end users with load centers associated with such permits.

Activities carried out under self-supply and cogeneration permits that remain in force at the time the interested party files its expression of interest may continue without interruption throughout the migration process. However, the migration procedure may not result in any increase in the installed capacity of the relevant generation plant.

All notices and communications relating to the migration process must be submitted through the dedicated Migration Window and the applicant's designated email address.

Under the guidelines, migration is voluntary, comprehensive, and irreversible. Participation requires the express waiver of the legacy legal structure, resulting in the early termination of the corresponding permit, as well as all related agreements and ancillary contracts.

Legacy projects may migrate into one of the following generation schemes recognized under the LSE:

- Isolated self-consumption (autoconsumo aislado);
- Grid-connected self-consumption; or
- Wholesale electricity market generation (MEM).

Specifically, the guidelines establish that migration may be carried out under any of the following modalities:

Modality	Description
i. Generation plant migration	Applicable to generation plants currently operating under a legacy self-supply or cogeneration structure.
ii. Joint migration of a generation plant and load centers to a MEM generation permit	Applicable when generation plants and load centers migrate simultaneously under coordinated implementation dates. The generation plant must be represented in the MEM by a market participant acting as generator. Load centers may be grouped under one or more qualified user registrations and represented by a qualified supplier.
iii. Migration of end users as qualified users	Applicable to load centers whose individual or aggregated demand is equal to or greater than 1 MW and which seek registration as qualified users.
iv. Migration of end users to basic supply service	Applicable to load centers that wish to continue receiving, or begin receiving, basic supply service.
v. Joint migration of a generation plant and local loads to a grid-connected self-consumption permit	Applicable where a generation plant and one or more local loads jointly migrate to a grid-connected self-consumption scheme with at least one self-consumption user.
vi. Joint migration of a generation plant and local loads to an Isolated self-consumption permit	Applicable where a generation plant, together with at least one self-consumption user, migrates to an isolated self-consumption arrangement.

Migration process

For migration processes involving generation plants, the following stages and timetable apply:

- **Stage 1:** Submission of expression of interest. Applicants must register their intention to participate through the migration window.
June 19 – September 18, 2026.
- **Stage 2:** Submission of migration application. Applicants must file the formal migration application using the prescribed format and supporting documentation.
September 21 – October 16, 2026.
- **Stage 3:** Deficiency notice and admission review. A single deficiency notice may be issued, followed by either admission or rejection of the application, as applicable.
October 19 – December 24, 2026.
- **Stage 4:** Regulatory resolution. Issuance of the CNE resolution and, where applicable, grant of the relevant permit, registration as a qualified user, and removal of load centers from the legacy scheme.
December 28, 2026 – February 12, 2027.
- **Stage 5:** Metering functionality review. Verification of metering systems for generation plants and load centers.
October 19, 2026 – February 12, 2027.
- **Stage 6:** Registration of physical assets. Registration of physical assets by the relevant market participant.
February 15 – March 5, 2027.
- **Stage 7:** Compliance and market readiness. Completion of metering requirements, dispatchability status, and minimum operational testing requirements.
February 15, 2027 – August 15, 2028.
- **Stage 8:** Execution of new market agreements. Execution of the applicable interconnection and/or connection agreement and termination of legacy contracts and related agreements.
August 16 – October 6, 2028 (different deadlines apply for projects lacking evidence of commercial operation).
- **Stage 9:** Market activation. Physical asset status becomes “enabled” and commercial operation within the MEM commences.
October 6, 2028.

Migration procedures applicable solely to load centers are subject to a separate and shorter process, which concludes on **August 15, 2028**.

Applicants that had previously requested migration under either the former Electricity Industry Law (LIE) or the LSE before publication of these guidelines **must ratify their request through the migration window by filing the corresponding expression of interest.**

To consult the complete guidelines, you can access this [link](#).

Methodology for transmission service charges applicable to LSPEE generation plants

The new methodology establishes that the transmission service charge applicable to each permit holder will be calculated based on the amounts determined by the National Energy Control Center (CENACE) and charged to the supplier as a result of market settlements relating to: transmission services; distribution services; CENACE operational services; and ancillary services not included within the MEM settlement process, all in accordance with the applicable market settlements manual.

The new methodology will become effective on **October 19, 2026**, superseding all previous methodologies governing this matter.

A significant exception applies in connection with the **voluntary migration program**. The new transmission charge will **not apply during the period from October 19, 2026 through October 6, 2028** to permit holders that initiate a voluntary migration process under the LSE framework. However, permit holders that fail to complete the migration process will lose this benefit.

To consult the complete methodology, you can access it through this [link](#).

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