

CNE Publishes New Interconnection or Connection Agreement Model for Power Plants, Electricity Energy Storage Systems, and Load Centers

Mexico City, March 20, 2026

On March 18, 2026, the National Energy Commission (*Comisión Nacional de Energía*, “CNE”) published a resolution pursuant to which it issued a new model agreement for the interconnection and/or connection of Power Plants, Electricity Energy Storage Systems, and Load Centers to the National Transmission Grid (*Red Nacional de Transmisión*) or the General Distribution Grids (*Redes Generales de Distribución*) (the “Agreement”)¹.

This new model agreement replaces the one that had been in effect since 2016, issued by the now-defunct *Comisión Reguladora de Energía* (“CRE”).

Key changes compared to the prior model agreement

Among the principal changes, the new model agreement highlights the following:

- Expanded purpose: in addition to regulating the physical interconnection or connection, the purpose of the Agreement now also includes ensuring the construction of the infrastructure required for such interconnection or connection (or both), thereby strengthening the link between the Agreement and the execution of such infrastructure works.
- Term: unlike the prior model, which contemplated a fixed term starting from the commercial operation date, the term of the new model agreement is tied to the term of the electricity generation or energy storage permit, or to the existence of the physical connection in the case of Load Centers. In practical terms, this change aligns the duration of the Agreement with that of the permit or the Load Center’s physical connection, reducing scenarios in which one exists without the other.

¹ https://dof.gob.mx/nota_detalle.php?codigo=5782317&fecha=17/03/2026#gsc.tab=0

- Extensions: the new model agreement provides that extensions longer than six (6) months must be processed in accordance with applicable regulations, including, as applicable, the need to amend the generation or storage permit before the CNE, or the corresponding filing with the National Energy Control Center (*Centro Nacional de Control de Energía*, "CENACE") in the case of Load Centers. Although the model agreement does not expressly so provide, this may imply that extensions of six (6) months or less would not require an amendment to the permit before the CNE.
- Event of default (timeline for execution of works and start date): the new model agreement reduces the maximum period to comply with obligations relating to the commencement and completion of interconnection or connection works from twelve (12) to six (6) months, counted from the scheduled date or any extension thereof.
- Guarantees: as with the prior model, the new model agreement requires the permit holder or the owner of the Load Center to provide a guarantee to secure compliance with the obligations assumed by the applicant as a result of the interconnection, connection, or both, of Power Plants, Electricity Energy Storage Systems, and Load Centers to the National Transmission Grid or the General Distribution Grids, in accordance with the Interconnection Manual and the Agreement. However, the new model agreement eliminates the prior scheme that combined enforcement of guarantees with a daily penalty of 2% of the cost of the interconnection or connection works (subject to a 10% cap), replacing it with a mechanism under which, in the event of non-compliance with the timely execution of the interconnection or connection works, total or partial enforcement of the guarantee will proceed in accordance with the Interconnection Manual.
- New penalty clause (metering): under the applicable regulations and the Agreement, Transporters or Distributors are required to install a system for (i) power quality measurement and electricity settlement, and (ii) the recording of metering data. Such a system may be installed by the Transporter or Distributor, or by the interconnection applicant, provided that the infrastructure and available space permit it. Verification of the proper functioning of the metering system will be carried out by the Transporter or Distributor at the location where the metering system is installed.

The new model agreement also introduces a specific penalty clause in the event that the agreement holder does not allow verification, inspection, or access to the metering systems used to record and measure injected or consumed electricity. This penalty consists of a monthly payment, for as long as the breach continues, of an amount determined in accordance with the applicable administrative provisions, which, in practical



terms, corresponds to the regulated charges that would have applied had a valid metering system been in place.

- Use of electronic means: the possibility for interconnection or connection agreements (or both), as well as their amendments, to be executed via electronic means or Advanced Electronic Signature (*Firma Electrónica Avanzada*) is expressly recognized.

For reference, the Sole Exhibit includes a comparative list summarizing the most relevant changes between the new model agreement and the prior model.

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Sole Exhibit
Comparative Summary

Clause	Prior model agreement	New model agreement
Purpose (First Clause)	Limited to performing and maintaining the physical interconnection of the power plant or the load center.	In addition to performing and maintaining the physical interconnection/connection, it includes the obligation to ensure the construction of the required infrastructure.
Term (Second Clause)	Fixed term (in years), counted from the estimated commercial operation date.	Tied to the term of the generation or storage permit, or to the subsistence of the physical connection. Automatically terminates upon expiration of the permit term or upon cancellation of the physical connection.
Termination for breach related to start/completion date of infrastructure (Third Clause, subsection (b))	Termination for a delay of more than twelve (12) months in the start or completion of interconnection or connection works.	The period for termination is reduced to six (6) months of delay in the start or completion of interconnection or connection works.
Amendments (Fourth Clause)	Amendments are permitted. If a change modifies the model, CRE approval is required.	The general rule is maintained. However, amendments that do not involve a technical modification, that derive from changes to the generation or storage permit, or that do not modify the model agreement may be agreed directly between Federal Electricity Commission (<i>Comisión Federal de</i>



Clause	Prior model agreement	New model agreement
		<i>Electricidad, "CFE"), as Transporter or Distributor, and the applicant, without prior approval from the CNE or CENACE.</i>
Communications/electronic means (Fifth Clause)	General regime for written communications and notices.	Adds the possibility of executing the agreement and its amendments via electronic means or Advanced Electronic Signature.
Required infrastructure (Eighth Clause)	Distinguishes between works performed by the applicant (between the power plant and the interconnection point) and works at the interconnection point (to be performed by CFE, as Transporter, Distributor, or a third party).	Reorganizes the clause around the required infrastructure, with cross-references to the Interconnection and Connection Manual and the Administrative Provisions of General Application regarding Contributions.
Metering (Eleventh Clause)	Installation of the meter and metering/communications equipment is the applicant's responsibility.	Introduces the concept of the "Metering System", with cross-references to the Metering Manual for Settlements and the Manual of Information and Communications Technology Requirements for the National Electric System and Wholesale Electricity Market. It also provides that associated equipment may be granted to CFE, as Transporter or Distributor, under a bailment arrangement.
Extensions (Twelfth Clause)	Any extension must be processed in accordance with applicable regulation,	Extensions longer than six (6) months require regulatory processing, including



Clause	Prior model agreement	New model agreement
	including amendment of the permit before the competent authority.	amendment of the permit before the CNE or processing before CENACE, as applicable to an interconnection or a connection.
Fortuitous event/force majeure (Nineteenth and Twentieth Clauses)	Includes classic events. Excludes market changes, exchange-rate parity, delivery delays, and equipment defects.	Adds as a possible force majeure event the operating conditions of the National Electric System, the National Transmission Grid, or the General Distribution Grids necessary to preserve reliability and safety. Increases in prices or costs are excluded as grounds for fortuitous events or force majeure.
Service interruptions (Twenty-Second Clause)	Grounds for suspension: emergency, force majeure, and the scenarios set forth in Article 46 of the regulations of the abrogated Electric Industry Law.	Grounds for suspension: emergency, force majeure, scenarios under the Administrative Provisions of General Application for public service, Article 117 of the Regulations of the Electric Sector Law, and Article 56 of said law.
Guarantees (Twenty-Sixth Clause)	Enforcement of the applicant's guarantee, plus a penalty payable by the transporter, distributor, or contractor: 2% per day of the cost of works, capped at 10%.	Total or partial enforcement of the applicant's guarantee pursuant to the Interconnection Manual. The daily penalty is eliminated.
New penalty clause (Twenty-Seventh Clause)	No equivalent clause in the prior model.	Penalty for preventing the review of metering systems (metering systems for settlement, quality, and electricity data recording): monthly payment pursuant to the Administrative Provisions of General



Clause	Prior model agreement	New model agreement
		<p>Application on Public Transmission and Distribution Service, for as long as the breach continues.</p> <p>In practical terms, this corresponds to the regulated charges that would have applied had there been valid metering.</p>

