

SENER and CNE Clarify the Transitional Treatment of Transmission Charges

Mexico City, September 14, 2026

On September 10, 2026, during a workshop on the migration of legacy permits, the legal departments of the Ministry of Energy ("SENER") and the National Energy Commission ("CNE") clarified the interpretation they consider applicable to transmission-service charges during the transition period.

This interpretation is relevant to permit holders seeking to use the extended migration schedule published on September 8, as it confirms that extending the deadlines to register the statement of interest and file the migration application does not, by itself, extend the current tariff regime.

Interpretation presented at the workshop

Under the interpretation presented at the workshop, the new transmission methodology will apply from October 19, 2026 to legacy agreements subject to it.

To remain under the prior methodology without interruption as of that date, a permit holder must register its statement of interest and file its migration application before October 19, 2026.

Accordingly:

- If the statement of interest is registered and the migration application is filed before October 19, the prior methodology will continue to apply throughout the migration procedure.
- If the statement of interest is registered before October 19 but the migration application is filed after that date, the new methodology will apply from October 19 until the application is filed.

Once the migration application is filed, the prior methodology will be reinstated. According to the authorities at the workshop, amounts paid during the interim period (that is, before

both the statement of interest and the migration application have been filed) will not be refunded or retroactively adjusted.

For example, if a permit holder registers its statement of interest on October 10, 2026, and files its migration application on November 15, 2026, the new transmission methodology will apply from October 19 through November 14. Once the application is filed on November 15, the prior methodology will again apply prospectively. Amounts paid during the interim period will not be refunded.

At the same workshop, the authorities announced that an amendment to the transmission methodology would be published soon to clarify and confirm this interpretation. Accordingly, this update reflects the statements made by SENER and CNE at the workshop and should be revisited once the final amendment is published.

The window for filing the migration application opens on September 21, 2026. Permit holders seeking to avoid any interruption in the prior methodology should prepare and register their statement of interest and file their migration application before October 19, 2026, without waiting for the extended schedule's final deadlines. In practice, October 19 is the key date for permit holders seeking to remain continuously under the prior tariff regime throughout the migration process.

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