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New Regulations on Electricity Generation Permits for Interconnected Self-Consumption (0.7 - 20MW) in Mexico

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As of October 4, 2025, new regulations issued by Mexico's National Energy Commission ("CNE") have taken effect, applicable to the requirements, documents, and information needed to apply for electricity generation permits for interconnected self-consumption power plants with generation capacities between 0.7 and 20 MW.

Previously, on March 30, 2022, the now extinct Energy Regulatory Commission published Resolution A/006/2022 in the Official Journal of the Federation ("DOF"), by which it issued the General administrative provisions setting forth the terms for submitting information regarding corporate purpose, legal, technical and financial capacity, project description, and the application form for electricity generation permit applications (the "2022 Regulations"). Currently, the Electronic Filing Desk ("OPE") of the CNE details the requirements established in the 2022 Regulations.

Subsequently, on August 6, 2025, the CNE published a resolution in the DOF establishing requirements to obtain electricity generation permits specifically for interconnected self-consumption projects involving power plants with a capacity between 0.7 and 20 MW (the "2025 Regulations"). This resolution provides that it would enter into force concurrently with the executive rules of the Electricity Sector Law and the Law on Planning and Energy Transition, both of which were published in the DOF on October 3, 2025.

The 2025 Regulations were issued pursuant to Article 30, second paragraph, of the Electricity Sector Law, which allows for a simplified procedure to obtain permits for interconnected self-consumption projects within the 0.7 to 20 MW range, in accordance with the guidelines issued by the CNE.

In reality, the CNE did not create a simplified procedure for these types of projects, but instead established various relaxed requirements by eliminating part of the documentary burden from the 2022 Regulations. Among the elements no longer required are the exhaustive breakdown of the business plan, disclosure of the full ownership and corporate structure up to individual shareholders, as well as certain commitment letters.

Other requirements remain, although with some nuances. The financing plan must now only be described in general terms; the construction schedule is limited to three fundamental phases, in contrast with the detailed timeline required under the 2022 Regulations; also, technical information related to the plant's capacity, technology, and location must still be submitted, but now with fewer formalities.

The CNE regulations also incorporate specific requirements stemming from the new Electricity Sector Law, such as identifying the users (sic) of an associated private grid, and the obligation to indicate the backup capacity available to the power plant in case it deploys an intermittent technology.

Despite these changes, certain requirements provided by law remain in force and continue to represent a significant challenge for applicants. Most notably, there is still the obligation to submit proof of filing of the Social Impact Assessment for the Energy Sector (formerly the Social Impact Evaluation). Likewise, a controversial requirement under the 2022 Regulations remains in effect: the submission of the impact study prepared by the National Center for Energy Control.

In conclusion, the 2025 Regulations represent a step in the right direction by easing certain requirements, although they fail to address key elements that have a significant impact on the cost and timing of project development.

We hope this report will be useful for clients and readers as they evaluate the development of future onsite electricity generation projects. At CCN, we place our full experience at your disposal for the preparation and filing of permit applications, clarification and comparison of requirements, responses to authority requests, and monitoring procedures through their conclusion.

