

Note: Form instructions and definitions will be created to support the report. Instructional guidance and training will be developed. Numbering to be updated based on final approved form.

RECIPIENT NAME	COMMONWEALTH EDISON CO	OMB Control No.	OMB Control No. 0660-0052
		Expiration Date	Exp. Date: 2/28/2027

Middle Mile Grant Program Bi-Annual Performance Report									
A. GENERAL INFORMATION									
1a. Recipient Organization:		COMMONWEALTH EDISON CO		1h. Award Identification Number:		17-40-MM554			
1b. Recipient Street Address:		10 South Dearborn Street		1i. Report Date (MM/DD/YYYY):		05/21/2025			
1c. City, State, and Zip Code:		CHICAGO, Illinois 60603		1j. Final Report:		Yes		No	X
1d. Unique Entity Identification (UEI) Number:		MJEXZQW6PD76		1k. Report Period Start Date (MM/DD/YYYY):		10/01/2024			
1e. Award Start Date (MM/DD/YYYY):		07/01/2023		1l. Report Period End Date (MM/DD/YYYY):		03/31/2025			
1f. Award End Date (MM/DD/YYYY):		06/30/2028							
1g. Name of Person Completing Report:		Beata Okruta							
B. PROJECT NARRATIVE									
Please use the section below to provide a project narrative of the project(s). This section aims to help reviewers better understand what project is being proposed and steps taken to achieve this goal.									
2a. A brief description of the recipient's organization and scope of work/project priorities.		Commonwealth Edison (ComEd) is one of the largest electric utilities in the nation, responsible for delivering safe and reliable power to over 4 million homes & businesses across 11,400 square miles in northern Illinois, including the City of Chicago. As part of the Middle Mile (MM) Grant, ComEd will: 1) Expand fiber capacity to be allocated for last mile providers, supplied indiscriminately and in perpetuity where technically feasible, and at dark fiber rates that will drive the material reduction of end user service pricing; 2) Build appropriate ‘off-ramps’ (e.g third-party interconnection points) at key locations along these routes for last-mile providers to more easily interconnect into ComEd’s middle-mile infrastructure without interfering with ComEd’s electric operations							

2b. An overview of the significant outputs and outcomes to be accomplished in the project.	By maximizing deployment efficiency and leveraging its planned utility fiber deployment, ComEd will be bringing new available low-cost MM infrastructure into 24 communities in need, representing over 440,000 households.
2c. How would the project meet the recipient’s business and/or administrative need(s)?	ComEd needs an extremely reliable, low-latency & secure communication systems to run its highly reliable and resilient electric grid. The system physically touches every residence and business in its service territory. ComEd will be enhancing its communication systems to meet current and future systems needs due to the increased penetration of distributed energy resources, electric vehicles, electrification and other decarbonization goals & requirements. This grant presents an unprecedented opportunity to leverage ComEd’s planned work, experience, and expertise to install middle mile fiber for broadband at a low-cost (essentially incremental cost of the larger fiber bundle and other program costs) & on a shovel-ready timeline.
2d. Provide an overview of key accomplishments achieved for this reporting period on the MM infrastructure project.	During the reporting period, ComEd has installed 2.36 miles of fiber. ComEd has also completed several miles of engineering packages and is preparing several miles for fiber installation.
2e. Provide any roadblock experienced during this reporting period impacting the expansion of the MM infrastructure project (i.e., supply chain, availability of labor).	No issues exist within ComEd's Supply Chain Risk Report. No issues exist within ComEd's Contractor Resource Report.
2f. Provide any barriers to improving job quality experienced during this reporting period.	None for this reporting period.

C. INFRASTRUCTURE MILESTONE CATEGORIES AND PROJECT TIMELINE							
Please use the chart below to provide the start date and end date of your project.							
OVERALL PROJECT	PROJECT DURATION	3a. PROJECT START DATE	3b. PROJECT END DATE				
	1826	07/01/2023	06/30/2028				
<p>Please provide the start and end dates for each milestone category of your project. The duration is be based on the start and end dates of each category.</p> <p>Please use the table provided to indicate your EXPECTED percentage of completion on a bi-annual basis for each year of your project. Year 1 begins with your award start date.</p> <p>The percentage of completion should be based primarily on the expenditure of your project budget and should be reported cumulatively from award inception through the end of each semi-annual reporting period. For example, if you expect to complete a particular milestone within the first three periods of your project, the third period and all subsequent periods should state 100%.</p> <p>*** Period 1 ends September 30 and Period 2 ends March 31. Additional columns may be added for a Year 6, Period 1 or 2, Baseline if the Period of Performance is 5 years.</p> <p>Please write “0” in the duration field if your project does not include an activity. If necessary, please insert additional milestones at the end.</p>							
ANTICIPATED PROJECT MILESTONES***			Year 1 Baseline	Year 2 Baseline	Year 3 Baseline	Year 4 Baseline	Year 5 Baseline

3c. MILESTONE CATEGORIES	3d. DURATION (Days)	3e. START DATE	3f. END DATE	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
Overall Project	1826	2023-07-01	2028-06-30	1%	5%	15%	25%	40%	50%	60%	70%	80%	100%
Environmental Assessment	80	2023-09-26	2023-12-15	25%	100%	%	%	%	%	%	%	%	%
Network Design	1460	2023-07-01	2027-06-30	40%	50%	50%	60%	60%	80%	80%	90%	100%	%
Rights Of Way	1460	2023-07-01	2027-06-30	40%	50%	50%	60%	60%	80%	80%	90%	100%	%
Construction Permits And Other Approvals	1460	2023-07-01	2027-06-30	40%	50%	50%	60%	60%	80%	80%	90%	100%	%
Site Preparation	1582	2023-07-01	2027-10-30	0%	10%	20%	30%	45%	60%	70%	80%	90%	100%
Equipment Procurement	1460	2023-07-01	2027-06-30	40%	50%	50%	60%	60%	80%	80%	90%	100%	%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	1460	2023-07-01	2027-06-30	40%	50%	50%	60%	60%	80%	80%	90%	100%	%

Equipment Deployment	1642	2024-01-01	2028-06-30	0%	0%	10%	15%	25%	37%	50%	63%	75%	100%
Network Testing	1642	2024-01-01	2028-06-30	0%	0%	10%	15%	25%	37%	50%	63%	75%	100%
Status of Procurement	0	2024-01-01	2024-01-01	0%	0%	10%	15%	25%	37%	50%	63%	75%	100%
<p>Please use the table provided to indicate your ACTUAL percentage of completion on a bi-annual basis for each year of your project. Year 1 begins with your award start date.</p> <p>The percentage of completion should be based primarily on the expenditure of your project budget and should be reported cumulatively from award inception through the end of each semi-annual reporting period. For example, if you expect to complete a particular milestone within the first three periods of your project, the third period and all subsequent periods should state 100%.</p> <p>Please provide a brief description of the primary activities involved in meeting each milestone (a single description should be provided for each milestone, covering all periods in years one through N).</p> <p>*** Period 1 ends September 30 and Period 2 ends March 31. Additional columns may be added for a Year 6, Period 1 or 2, Baseline if the Period of Performance is 5 years.</p> <p>Please write the number “0” if your project does not include an activity. If necessary, please insert additional milestones at the bottom of the chart. Please add additional milestones as applicable.</p>													
ACTUAL PROJECT MILESTONES***				Year 1		Year 2		Year 3		Year 4		Year 5	
				Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
4a. MILESTONE	4b. DESCRIPTION			Actual Milestone Completion (Cumulative)									
Overall Project	Engineering and Construction of Middle Mile Fiber (Aerial and Buried)			1%	4%	4%	7%						
Environmental Assessment	Completion of the NEPA Analysis			25%	95%	100%	100%						

Network Design	Network Engineer Reviews and Approves Engineering Package (IFC Date)	40%	50%	50%	52%						
Rights Of Way	Completing Easement Searches and Rights of Way Agreements (IFC Date)	40%	50%	50%	52%						
Construction Permits And Other Approvals	Securing Construction Permits (IFC Date)	40%	50%	50%	52%						
Site Preparation	Overhead or Underground Site Preparation (Make Ready Completion Date)	0%	0%	1%	6%						
Equipment Procurement	Submit Material Order Requests for Fiber, Conduit, and Other Materials (IFC Date)	40%	50%	50%	52%						
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	Completion of Engineering Package (IFC Date)	40%	50%	50%	52%						
Equipment Deployment	Construction of Middle Mile Fiber Routes (OTDR Completion Date)	0%	0%	0%	1%						
Network Testing	Testing of Middle Mile Fiber (OTDR Completion Date)	0%	0%	0%	1%						
Status of Procurement	All Materials and Services Received for Fiber construction (OTDR Completion Date)	0%	0%	0%	1%						

Subrecipient and Subawards										
List of Subrecipient(s) that received a subaward or subcontract from the eligible entity and a description of the specific project for which grant funds were provided.										
Associate projects names to any subrecipient or subaward associated with grant, approved grant funds, and expenditures to date.										
5a. Project Name	Status	5b. Project Description	5c. Subrecipient	5d. Minority Business Enterprise (MBE)	5e. Women's Business Enterprise (WBE)	5f. Labor Surplus Area Firm	5g. Awarded Funds	5h. Expenditur es to Date	5i. Remaining Grant Balance	5j. % of work complete
							\$	\$	\$	%

D. INFRASTRUCTURE BUDGET EXECUTION DETAILS							
Please provide details below on your total budget and total fund expended to date for each budget element, including detailed disbursements of both matching funds approved and federal funds obligated from project inception through end of this reporting period. Figures should be reported cumulatively from award inception to the end of the applicable reporting period.							
6a. Projected Budget Element	6b. Federal Funds	6c. Non-Federal Funds	6d. Total Project Budget	6e. Total Federal Funds Expended to Date	6f. Total Non-Federal Funds Expended to Date	6g. Total Funds Expended	6h. Percent of Federal Funding Expended to Date (Cumulative)
6a. Administrative and legal expenses	\$2,016,400.00	\$5,865,600.00	\$7,882,000.00	\$87,847.53	\$417,567.67	\$505,415.20	4%
6a. Land, structures, rights-of way, appraisals, etc.	\$147,500.00	\$590,000.00	\$737,500.00	\$30,356.38	\$144,289.66	\$174,646.04	21%

6a. Relocation expenses and payments	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Architectural and engineering fees	\$2,348,700.00	\$9,654,800.00	\$12,003,500.00	\$467,986.99	\$2,223,286.15	\$2,691,273.14	20%
6a. Other architectural and engineering fees	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Project inspection fees	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Site work	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Demolition and removal	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Construction	\$5,997,094.40	\$40,472,537.60	\$46,469,632.00	\$337,535.20	\$1,604,510.37	\$1,942,045.57	6%
6a. Equipment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Miscellaneous	\$3,122,634.00	\$8,890,536.00	\$12,013,170.00	\$52,002.00	\$247,189.08	\$299,191.08	2%
6a. Subtotal	\$13,632,328.40	\$65,473,473.60	\$79,105,802.00	\$975,728.10	\$4,636,842.93	\$5,612,571.03	7%
6a. Contingencies	\$925,411.81	\$3,721,551.39	\$4,646,963.20	\$0.00	\$0.00	\$0.00	0%

6a. Totals	\$14,557,740.21	\$69,195,024.99	\$83,752,765.20	\$975,728.10	\$4,636,842.93	\$5,612,571.03	7%
------------	-----------------	-----------------	-----------------	--------------	----------------	----------------	----

E. COMMUNITY BENEFIT AGREEMENT

As stated in the MM Grant Program NOFO a Community Benefit Agreement (CBA) is an agreement signed by community benefit groups and a developer, identifying the community benefits a developer agrees to deliver, in return for community support of the project.

Please use the fields below to state the Community Benefit Group and Developer Name and describe the activities in how this partnership has supported with the Middle Mile Infrastructure project (i.e. wage agreements, targeting hiring of apprentices and disadvantaged groups in labor marker, education and training opportunities, sub-contracting to local small business for construction, services, and supply chain needs).

Description of Community Agreement

7a. Community Benefit Group Name: Please provide the name of the Community Benefit Group

7b. Developer Name: Please provide the name of the Developer.

7c. Community Benefit Group and Developer Partnership: Please describe in the space below the nature of the partnership and how the MM grant funds being used are assisting to provide community support for the infrastructure project.

These questions were answered via file upload.  
Number of Community Agreements: 0  
File(s) Uploaded with Responses:

F. CLIMATE RESILIENCE

Recipients must demonstrate that they have sufficiently accounted for current and future weather and climate related risks to new MM infrastructure projects. At present, weather and climate related risks to broadband networks include wildfires, extreme heat and cold, inland and coastal flooding, and the extreme winds produced by weather events such as tornadoes, hurricanes, and other weather events. Because retrofitted and new infrastructure for broadband might be expected to have a lifetime of 20 years or more, recipients must account not only for current risks but also for how the frequency, severity, and nature of these extreme events may plausibly evolve as our climate continues to change over the coming decades.

Climate Resiliency Risk Mitigation



This purpose of this section is for the recipient to demonstrate that they have sufficiently accounted for current and future weather and climate-related risks to new MM infrastructure projects. In particular, each recipient should demonstrate how they've addressed the known and identifiable risks of current and future projected weather and climate conditions through measures such as (but not limited to) choice of a technology platform suitable to the climate risk of the region, reliance on alternatives siting of facilities (i.e., underground construction where appropriate), retrofitting, or hardening of existing assets, and use of network redundancy to safeguard against threats to infrastructure.			
8a. Were any geographic areas identified for this reporting period subject to an initial and/or updated hazard screening for future weather and climate related risk? If so, please provide the date of the screening and provide related documentation as an attachment to this report.			
No			
8b. Climate Resilience Category	8c. Date of Most Recent Hazard Screening	8d. Name and Title of Representative Completing Most Recent Hazard Screening	8e. Date of Report Completion
Files Uploaded for Hazard Screening Information: ClimateResilienceSection.xlsx			
8f. Identified Risk: For your MM project, what are the potential weather and climate hazards that may be most important to be addressed that could impact the resiliency of the middle mile infrastructure deployed (i.e. wildfires, extreme heat and cold, inland and coastal flooding, extreme winds: tornadoes, hurricanes and other weather events)?			
Locally, in the Chicago metropolitan area, the Federal Emergency Management Agency (FEMA) National Risk Index reports regional high hazard risk for temperature extremes, strong winds, tornados, ice storms, and winter weather – many of these events have recently caused billion-dollar disasters as reported by NOAA’s database.			
8g. Weather and Climate Hazards: Were any significant climate or weather hazards experienced during this reporting period (i.e., floods, tornados) impacting infrastructure buildout or service? Briefly describe how you monitored for weather and climate caused issues for the reliability of the system. If so, please provide the date of the disaster, location and backup documentation related (i.e., news articles).			

No
<p>To adapt and respond to these consequential climate projections ComEd and its parent company, Exelon, implemented a Climate Change Policy in 2015. This Climate Change Policy is a strategic management policy that incorporates climate change scenario analysis and considers the evolution of durable trends under different climate change related conditions. A range of scenarios as informed by the International Panel on Climate Change (IPCC), NOAA, FEMA and local Illinois government entities are used to analyze impacts to infrastructure and continually update the resiliency framework with sound, scientific recommendations. ComEd, as an electric utility, builds to critical infrastructure standards and invests in industry leading standards to ensure safety and reliability not only as materials degrade but to account for changing climate conditions. Approximately 90% of ComEd’s fiber infrastructure within Chicago is comprised of an extensive underground system which is significantly less susceptible to damage from extreme winds, derechos and other frequent local weather hazards. To mitigate risks from extreme precipitation and to account for future projections of rainfall, flooding, and inundation, the underground infrastructure is storm hardened and built to meet or exceed industry leading national standards from The Institute of Electrical and Electronic Engineers (IEEE), American National Standards Institute (ANSI), National Electric Code (NEC) and National Electrical Manufacturers Association (NEMA) to ensure submersibility and durability of infrastructure. For the remaining portions of overhead construction, in 2015, ComEd adopted the National Electric Safety Code Grade B standards, the sturdiest of the three existing construction classes.</p> <p>To ensure infrastructure is engineered and constructed to the level of resiliency required for a modern distribution system, a laser-based field tool with integrated GPS is used to capture photographs on site. Pole attributes such as pole height, wire span, and other general field metrics are collected and input to cloud-based pole software to verify measurements, perform structural analysis, and eliminate human error. Engineering design standards require the fiber network ensure N+1 redundancy to account for failure or necessary offline maintenance. This is achieved through redundant connections via fiber path rings and/or routable data fiber pathways which has resulted in 99.99% annual system reliability. Distribution standards are designed around anticipated wire sag/tension to ensure infrastructure is structurally sound during peak winds and storm events. In anticipation of oncoming storms as reported by the National Weather Service, ComEd deploys personnel to local field and office sites to swiftly prepare for impacts and mitigate any physical and operational outages. ComEd Emergency Preparedness response teams work to restore services quickly and safely to homes and businesses. One of the first priorities in response to storms is to clear debris by cutting, trimming, and removing trees or branches and other safety hazards. A damage assessment is conducted by response crews to determine an Estimated Time of Restoration (ETR). The ETR varies depending on what the on-site crew may find.</p>
<b>8h. Risks to Deployment of New Infrastructure:</b> Has the team identified any risks impacting the deployment of new or repaired infrastructure due to current and future weather and climate-related threats during this reporting period?
No
<b>8i. Risk Mitigation:</b> How will the project avoid and/or mitigate the risk identified? If not applicable, please explain why.
<p>To adapt and respond to these consequential climate projections ComEd and its parent company, Exelon, implemented a Climate Change Policy in 2015. This Climate Change Policy is a strategic management policy that incorporates climate change scenario analysis and considers the evolution of durable trends under different climate change related conditions. A range of scenarios as informed by the International Panel on Climate Change (IPCC), NOAA, FEMA and local Illinois government entities are used to analyze impacts to infrastructure and continually update the resiliency framework with sound, scientific recommendations. ComEd, as an electric utility, builds to critical infrastructure standards and invests in industry leading standards to ensure safety and reliability not only as materials degrade but to account for changing climate conditions. Approximately 90% of ComEd’s fiber infrastructure within Chicago is comprised of an extensive underground system which is significantly less susceptible to damage from extreme winds, derechos and other frequent local weather hazards. To mitigate risks from extreme precipitation and to account for future projections of rainfall, flooding, and inundation, the underground infrastructure is storm hardened and built to meet or exceed industry leading national standards from The Institute of Electrical and Electronic Engineers (IEEE), American National Standards Institute (ANSI), National Electric Code (NEC) and National Electrical Manufacturers Association (NEMA) to ensure submersibility and durability of infrastructure. For the remaining portions of overhead construction, in 2015, ComEd adopted the National Electric Safety Code Grade B standards, the sturdiest of the three existing construction classes.</p> <p>To ensure infrastructure is engineered and constructed to the level of resiliency required for a modern distribution system, a laser-based field tool with integrated GPS is used to capture photographs on site. Pole attributes such as pole height, wire span, and other general field metrics are collected and input to cloud-based pole software to verify measurements, perform structural analysis, and eliminate human error. Engineering design standards require the fiber network ensure N+1 redundancy to account for failure or necessary offline maintenance. This is achieved through redundant connections via fiber path rings and/or routable data fiber pathways which has resulted in 99.99% annual system reliability. Distribution standards are designed around anticipated wire sag/tension to ensure infrastructure is structurally sound during peak winds and storm events. In anticipation of oncoming storms as reported by the National Weather Service, ComEd deploys personnel to local field and office sites to swiftly prepare for impacts and mitigate any physical and operational outages.</p>

ComEd Emergency Preparedness response teams work to restore services quickly and safely to homes and businesses. One of the first priorities in response to storms is to clear debris by cutting, trimming, and removing trees or branches and other safety hazards. A damage assessment is conducted by response crews to determine an Estimated Time of Restoration (ETR). The ETR varies depending on what the on-site crew may find.	
8j. Additional Information: Is there any additional information you would like to share during this reporting period that the grant team should be aware of regarding the management of sustainable climate resiliency for your MM project?	
None	
8k. Additional Resources Has the team utilized the available resources to assist with mitigation and long-term planning efforts for this reporting period? If so, which resources? 2018 National Climate Assessment NOAA's 2022 State Climate Summaries NOAA Disaster and Risk Mapping Tool NOAA's Storms Event Database NOAA Climate Explorer and Digital Coast FEMA National Risk Index Consulted FEMA-approved Hazard Mitigation Plans prepared by states in which they propose to build middle mile infrastructure to help identify key risk and hazards	
Yes	
The Team has used the FEMA National Risk Index to determine the climate resilience category.	

G. Workforce	
For projects receiving over \$5,000,000 (based on expected total cost), as determined by the U.S. Secretary of Labor by subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing.	
Davis-Bacon Certification	
9a. Does the recipient have access to the information requested (all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing?)	No
Local Hire Prioritization and Impact	

Local hiring is a goal or requirement to hire people who live close to the place of work. This aim is often more specifically structured as a requirement for contractors awarded certain types of publicly funded projects to recruit a certain proportion of the people working on the project from a particular area. Please **provide all direct hires and contractors supporting** the MM Infrastructure project.

Please use the table below to describe how the project prioritizes local hiring.

Hires by Race, Ethnicity and Sex	Number of Hires																					
	Race/Ethnicity																					
	9b. Hispanic or Latino			9c. Non-Hispanic/Non-Latino																		Totals
				9c-1. Men						9c-2. Women												
	9b-1. Men	9b-2. Women		White	Black or African American	Native Hawaiia n or Pacific Islander	Asian	Native America n or Alaska Native	Two or More Races	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More Races							
Number of Local Direct Hires	18	0		11	26	0	0	0	3	0	4	0	0	0	0						62	
Number of Non-Local Direct Hires	1	0		8	2	0	0	0	1	0	0	0	0	0	0						12	
Percentage of Local Direct Hires on Award	95%	0%		58%	93%	0%	0%	0%	75%	0%	100%	0%	0%	0%	0%							
Number of Local Subcontractors	23	4		63	7	0	8	0	1	17	1	0	3	0	1						128	
Number of Non-Local Subcontractors	0	0		11	0	0	1	0	0	3	0	0	0	0	1						16	

Percentage of Local Subcontractors on Award	100%	100%		85%	100%	0%	89%	0%	100%	85%	100%	0%	100%	0%	50%							
---	------	------	--	-----	------	----	-----	----	------	-----	------	----	------	----	-----	--	--	--	--	--	--	--

Davis-Bacon Act Wages	
Please confirm if wages are at least prevailing*	
*As stated in the MM NOFO as determined by the U.S. Secretary Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State (or the District of Columbia) in which the work is to be performed.	
10a. Are wage rates at least the Davis-Bacon prevailing wage for all laborers?	No
10b. Please cite your source of how this information was gathered (for 10a).	ComEd provides project employment and local impact report data in ComEd's Bi-Annual Performance reports as the alternative to the Davis-Bacon and Prevailing Wage certification requirement (Section VI.E.7.a of the Middle Mile NOFO). ComEd has been collecting wage and benefit information with respect to construction contractors and construction internal laborers.
10c. Are wage rates at least the prevailing wage for all mechanics?	No
10d. Please cite your source of how this information was gathered (for 10c).	ComEd provides project employment and local impact report data in ComEd's Bi-Annual Performance reports as the alternative to the Davis-Bacon and Prevailing Wage certification requirement (Section VI.E.7.a of the Middle Mile NOFO). ComEd has been collecting wage and benefit information with respect to construction contractors and construction internal laborers.

10e. If you answered "No" to either 10a. or 10c., please provide an attachment reporting the wages and benefits of workers on the project by job classification, and whether those wages are less than the prevailing wage.	
---	--

Workforce Demographic Data																						
Jobs by Race, Ethnicity and Sex	Number of Jobs																					
	Race/Ethnicity																					
	11-a. Hispanic or Latino			11b. Non-Hispanic/Non-Latino																		Totals
				11b-1. Men						11b-2. Women												
	11a-1. Men	11a-2. Women		White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More Races	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More Races							
Jobs Created	0	0		0	0	0	0	0	0	0	0	0	0	0	0						0	
Jobs Retained	19	0		19	28	0	0	0	4	0	4	0	0	0	0						74	

## Unionized Workforce

12-a. Does this project include some workforce elements that are unionized?	Yes
12-b. Are workers provided access to union educators/organizers on employer property or during the work day?	Yes
12-c. Does your MM project utilize a project labor agreement?	No
12-d. Did workers receive additional information or training about their workplace rights in addition to already required notice postings?	Yes

## H. Workforce Continuity Plan

National Labor Relations Act (29 U.S.C. 158 (f))

As stated in the MM NOFO, if a recipient has not provided a certification that a project either will use a unionized project workforce or included a project labor agreement, meaning a pre-hire collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. 158 (f)), then the recipient must provide a project workforce continuity plan.

## Workforce Continuity Plan

13a. Please describe the steps taken to ensure the project has ready access to a sufficient supply of appropriately skilled and unskilled labor to ensure construction is completed skillfully throughout the project's life (as required in Section III.B of the MM NOFO). As stated in the MM NOFO, the middle mile grant recipient is capable of carrying out the proposed project in a competent manner, including a plan to attract or retain an appropriate skilled and credentialed workforce.

ComEd, having installed, operated, and maintained over 2500 miles of fiber since the early 1990's, possesses the appropriately trained and skilled workforce to deliver this project. Beyond robust screening to assure job role prerequisites are met, candidates are supplied appropriate refresher training with training governance frameworks that ensure consistency in on-going training that meets evolving industry requirements, reviewed on an annual basis. The team and stakeholder groups that will be overseeing this project include ComEd's Strategy & Engineering, Communications Operations, Project Management and Construction, Communications Operations, among several others.

ComEd has an established set of standards and processes for the engineering, procurement, construction, operation, and maintenance of the fiber network. Program governance, stakeholder roles & responsibilities, and fiber design, deployment and turnover processes are reviewed and reinforced on an annual basis. The processes define when and how Contractors are engaged within the Fiber Route Design and Fiber Route Installation processes of the Fiber Engineering to Delivery & Turnover lifecycle. ComEd has certified, pre-approved engineering and construction contractors that will be used for this project, with credentials that meet federal and local standards. Contractors are required to sign terms and conditions that certify compliance with applicable laws pertaining to nondiscrimination and compliance. Formal onboarding processes, with required annual certifications of training, including job-specific and OSHA safety training are also required.

For your MM project, please provide a brief description of efforts made to attract, train or retain a skilled and credentialed workforce.

<p>ComEd, having installed, operated, and maintained over 2500 miles of fiber since the early 1990’s, possesses the appropriately trained and skilled workforce to deliver this project. Beyond robust screening to assure job role prerequisites are met, candidates are supplied appropriate refresher training with training governance frameworks that ensure consistency in on-going training that meets evolving industry requirements, reviewed on an annual basis. The team and stakeholder groups that will be overseeing this project include ComEd’s Strategy &amp; Engineering, Communications Operations, Project Management and Construction, Communications Operations, among several others.</p> <p>ComEd has an established set of standards and processes for the engineering, procurement, construction, operation, and maintenance of the fiber network. Program governance, stakeholder roles &amp; responsibilities, and fiber design, deployment and turnover processes are reviewed and reinforced on an annual basis. The processes define when and how Contractors are engaged within the Fiber Route Design and Fiber Route Installation processes of the Fiber Engineering to Delivery &amp; Turnover lifecycle. ComEd has certified, pre-approved engineering and construction contractors that will be used for this project, with credentials that meet federal and local standards. Contractors are required to sign terms and conditions that certify compliance with applicable laws pertaining to nondiscrimination and compliance. Formal onboarding processes, with required annual certifications of training, including job-specific and OSHA safety training are also required.</p>
<p>Has the team offered any of the following resources to assist with maintaining a sufficient supply of appropriately skilled labor force for this reporting period? If so, which resources (please provide a brief description of any of the following that apply):</p> <p>Professional Certifications In-House Training Registered Apprenticeships Labor-Management Partnerships Partnerships with entities like unions, community colleges, or community-based groups</p>
<p>ComEd, having installed, operated, and maintained over 2500 miles of fiber since the early 1990’s, possesses the appropriately trained and skilled workforce to deliver this project. Beyond robust screening to assure job role prerequisites are met, candidates are supplied appropriate refresher training with training governance frameworks that ensure consistency in on-going training that meets evolving industry requirements, reviewed on an annual basis. The team and stakeholder groups that will be overseeing this project include ComEd’s Strategy &amp; Engineering, Communications Operations, Project Management and Construction, Communications Operations, among several others.</p> <p>ComEd has an established set of standards and processes for the engineering, procurement, construction, operation, and maintenance of the fiber network. Program governance, stakeholder roles &amp; responsibilities, and fiber design, deployment and turnover processes are reviewed and reinforced on an annual basis. The processes define when and how Contractors are engaged within the Fiber Route Design and Fiber Route Installation processes of the Fiber Engineering to Delivery &amp; Turnover lifecycle. ComEd has certified, pre-approved engineering and construction contractors that will be used for this project, with credentials that meet federal and local standards. Contractors are required to sign terms and conditions that certify compliance with applicable laws pertaining to nondiscrimination and compliance. Formal onboarding processes, with required annual certifications of training, including job-specific and OSHA safety training are also required.</p>
<p>13b. Please describe below, the steps taken to minimize risks of labor disputes and disruptions that would jeopardize the timeliness and cost-effectiveness of completing the MM project.</p>
<p>In October, 2021, ComEd and Local 15 came to an agreement to develop the skills and competencies of our union represented employees in performing Overhead Fiber Optic work that previously was performed by contractors. The fiber installation, maintenance and splicing duties are currently performed by both ComEd Overhead employees and contractors. The number of ComEd employees performing the fiber optic work will increase as more employees are trained.</p>
<p>13c. Please describe below the steps to ensure a safe and healthy workplace that avoids delays and costs associated with workplace illnesses, injuries, and fatalities.</p>
<p>ComEd is committed to maintaining the highest standards of safety and reliability for our people, our customers and the communities in which we work and serve. As a fundamental value of our culture and operations, every member of the team is dedicated to putting safety first.</p> <p>ComEd’s leadership, beginning with the Supervisor, is responsible for providing the necessary resources to ensure a safe work environment, including training, tools, and equipment to perform work safely. Leadership sets the example for adherence to the safety program by always demonstrating safe behavior. As part of their responsibilities, leadership must conduct periodic one-on-one observations of their employees. During these observations, Supervisors shall recognize and support the safe behaviors observed and offer constructive feedback to reduce any at-risk behaviors. We will continue to work collaboratively with Local 15 leadership to address work safety issues and discuss changes to safety requirements.</p>



<p>Every employee is accountable for his or her safety and for ensuring the work environment is safe. Every day on every task, employees are expected to demonstrate the correct behaviors, meet safety requirements, and comply with procedures. Employees are encouraged to identify unsafe conditions and at-risk behaviors and to intervene to correct them. In addition, we strive to create a culture in which employees are not only dedicated to their own safety but to the safety of their fellow employees, whether management or craft, regardless of whether they work in the field or office environment.</p>
<p>13d. For your MM project, please provide a brief description below of efforts made to ensure a safe and healthy workplace.</p>
<p>For Overhead Electrician Special / Troubleman / Service Operators prerequisites include OSHA 1910.269 – Electric Power Generation, Transmission, and Distribution &amp; program entry qualifications for internal employees involve successful completion of prerequisite progression schools, OJT experience, and passing score on entry-level OES/Troubleman/Service Operator Knowledge Check. For external employees, journey-level field experience, passing score on entry-level Knowledge Check, and pass rating on entry-level physical Job Performance Assessments are required. Continued refresher training required for each Trainee is determined annually by Line &amp; Training organizations, with a Curriculum Review Council (CRC) and Training Council annual review of topics for selection and inclusion in continuing / refresher training.</p> <p>For Underground Splicers, pre-requisites include OSHA 1910.269 Electric Power Generation, Transmission, and Distribution. Candidates must pass all entrance screening examinations (CAST Test), pass an Initial Hire Examination, and satisfactorily complete a structured interview with a hiring group representative. Results of the Initial Hire Examination will determine if the candidate is enrolled in the Advanced Hire Initial Training Program or is considered for placement in the Underground Splicer Initial Training and Qualification Program. The Underground Splicer Initial Training and Qualification Program will ensure that the candidate has demonstrated the skill and knowledge to safely and independently perform entry-level tasks and participate in the Underground OJT/OJQ process.</p> <p>For Engineering roles, prerequisites include successfully meeting all required hiring criteria for their engineering position. Personnel entering engineering positions typically possess a significant level of relevant knowledge obtained by baccalaureate studies in engineering, a related technical field, or knowledge of engineering principles obtained through experience. Initial and Continuing training are offered with the Engineering Curriculum Review Committees (CRCs) and Training Advisory Councils (TACs) annual review of review topics, topic selection and inclusion.</p>
<p>Has the team offered any of the following resources to assist with maintaining a safe and healthy workplace for this reporting period? If so, which resources (please provide a brief description of any of the following that apply):</p> <p>Safety Training</p> <p>Certifications and/or Licensure Requirements for all relevant works (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other training required of workers employed by contractors)</p> <p>Issues raised by workplace safety committees and their resolutions</p>
<p>For Overhead Electrician Special / Troubleman / Service Operators prerequisites include OSHA 1910.269 – Electric Power Generation, Transmission, and Distribution &amp; program entry qualifications for internal employees involve successful completion of prerequisite progression schools, OJT experience, and passing score on entry-level OES/Troubleman/Service Operator Knowledge Check. For external employees, journey-level field experience, passing score on entry-level Knowledge Check, and pass rating on entry-level physical Job Performance Assessments are required. Continued refresher training required for each Trainee is determined annually by Line &amp; Training organizations, with a Curriculum Review Council (CRC) and Training Council annual review of topics for selection and inclusion in continuing / refresher training.</p> <p>For Underground Splicers, pre-requisites include OSHA 1910.269 Electric Power Generation, Transmission, and Distribution. Candidates must pass all entrance screening examinations (CAST Test), pass an Initial Hire Examination, and satisfactorily complete a structured interview with a hiring group representative. Results of the Initial Hire Examination will determine if the candidate is enrolled in the Advanced Hire Initial Training Program or is considered for placement in the Underground Splicer Initial Training and Qualification Program. The Underground Splicer Initial Training and Qualification Program will ensure that the candidate has demonstrated the skill and knowledge to safely and independently perform entry-level tasks and participate in the Underground OJT/OJQ process.</p> <p>For Engineering roles, prerequisites include successfully meeting all required hiring criteria for their engineering position. Personnel entering engineering positions typically possess a significant level of relevant knowledge obtained by baccalaureate studies in engineering, a related technical field, or knowledge of engineering principles obtained through experience. Initial and Continuing training are offered with the Engineering Curriculum Review Committees (CRCs) and Training Advisory Councils (TACs) annual review of review topics, topic selection and inclusion.</p>

As stated in the MM NOFO, if a recipient has not provided a certification that a project either will use a unionized project workforce or included a project labor agreement, meaning a pre-hire collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. 158 (f)), then the recipient must provide a project workforce continuity plan.

13e. Please provide the name(s) below of any subcontracted entities performing work on the project, and the total number of workers employed by each entity.

13e-1. Name of Subcontracted Entity Performing Work	Status	13e-2. Total Number of Workers within this Subcontract	13e-3. Job Categories of Workers Supporting Project within this Subcontract
Christopher Burke Engineering	Active	3	Environmental Contractor
Stantech	Active	6	Environmental Contractor
Burns & McDonnell	Active	27	Engineering Contractor
HBK	Active	34	Engineering Contractor
Millhouse	Active	15	Engineering Contractor
Talman	Active	4	Engineering Contractor
ECC	Active	14	Construction Contractor
Henkles & McCoy	Active	4	Construction Contractor
MJ Electric	Active	19	Construction Contractor
MEADE	Active	18	Construction Contractor

13f. Please describe below the steps taken to ensure that workers on the project receive wages and benefits sufficient to secure an appropriately skilled workforce in the context of the local and regional labor market.

ComEd has established controlled documents which provide the standard guidelines for salary compliance and follow the Fair Labor Standards Act (FLSA). ComEd is following well-established practices and has certified, pre-approved engineering and construction contractors that will be used for this project, with credentials that meet federal and local standards. Contractors are engaged through a rigorous RFP process and have a Supply Master Agreement (SMA) established that requires contractors to comply with applicable laws related to nondiscrimination, federal wage requirements, permits and licenses, statutes, codes, ordinances, rules, regulations, applicable guidance documents, lawful orders, and standards.

I. ANCHOR INSTITUTIONS										
Please provide Anchor Institution (AI) data for the current period only (not cumulative). Please add rows as needed.										
14a. Anchor Institution Name			These questions were answered via file upload. File Uploaded with Responses: AnchorInstitutionsSection.xlsx							
14b. Street Address										
14c. City										
14d. State										
14e. Type of Anchor Institution										
14f. Interconnection with 1,000 Feet of AI Enabling Gig Symmetrical Service										
14g. Narrative Description of how the Anchor Institution may benefit from the Grant Funded Infrastructure										

J. BROADBAND ACCESS KEY INDICATOR: SUBSCRIBERS AND SPEED										
Please use the following table to provide anticipated key indicators with the projected totals for each beneficiary category, access type and speed category for your infrastructure service or project. Except as indicated, information should be reported cumulatively from award inception through the end of the bi-annual period for Bi-Annual Indicators. Please write the number “0” if your project does not include this indicator.										
*** Period 1 ends September 30 and Period 2 ends March 31. Additional columns may be added for a Year 6, Period 1 or 2, Baseline if the Period of Performance is 5 years.										
PROJECTED NUMBER OF SUBSCRIBERS AND SPEED	Year 1		Year 2		Year 3		Year 4		Year 5	
ACCESS TYPE	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
15a. Anchor Institutions (AIs)***										
15a-1. Total Number of AIs passed	0	0	0	0						
15a-2 Number of AIs within 1,000 feet of the middle mile infrastructure	0	0	0	0						

15a-3. Total number of AIs served	0	0	0	0						
15a-4. AIs with new access	0	0	0	0						
15a-5. AIs with improved access	0	0	0	0						
15a-6. Total number of AIs served with speeds of at least 1/1Gbps	0	0	0	0						
15b. Broadband Wholesalers or Last Mile Providers***										
15b-1. Total number of broadband wholesalers or last mile providers served	0	0	0	0						
15b-2 Broadband wholesalers or last mile providers with new access	0	0	0	0						
15b-3. Broadband wholesalers or last mile providers with improved access	0	0	0	0						
15b-4. Total number of broadband wholesalers or last mile providers offering speeds of at least 25/3 Mbps	0	0	0	0						
15b-5. Total number of broadband wholesalers or last mile providers offering speeds of at least 100/20 Mbps	0	0	0	0						
15b-6. Total number of broadband wholesalers or last mile providers offering speeds of at least 1/1 Gbps	0	0	0	0						

K. BROADBAND ACCESS KEY INDICATOR: NETWORK BUILD PROGRESS						
Please use the following table to provide anticipated key indicators and progress of your Infrastructure project. Except as indicated, information should be reported cumulatively from award inception through the end of the bi-annual period. Please write the number “0” if your project does not include this indicator.						
*** Period 1 ends September 30 and Period 2 ends March 31. Additional columns may be added for a Year 6, Period 1 or 2, Baseline if the Period of Performance is 5 years.						
NETWORK BUILD PROGRESS***	Year 1	Year 2	Year 3	Year 4	Year 5	

KEY INDICATOR	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
16a. Total of new fiber miles (aerial or buried)	0	0	0	3						
16b. Total of fiber miles leased	0	0	0	0						
16c. Total of existing fiber miles upgraded	0	0	0	0						
16d. Total number of new microwave links	0	0	0	0						
16e. Total number of new towers	0	0	0	0						
16f. Total number of new interconnection points	0	0	0	0						
16g. Total number of signed agreements with broadband wholesalers or last mile providers	0	0	0	0						
16h. Total of potential agreements (i.e., agreements currently being negotiated) with broadband wholesalers or last mile providers (This Total should NOT be reported cumulatively)	0	0	0	0						

L. QUANTIFIABLE METRICS						
<b>Quantifiable Metrics</b> - Section designed to assist with <b>reporting</b> and <b>audit</b> purpose to quantify how much progress was made and track the location of where the progress was made.						
*** Period 1 ends September 30 and Period 2 ends March 31. Additional columns may be added for a Year 6, Period 1 or 2, Baseline if the Period of Performance is 5 years.						
17a. Fiber Optic Based ***	Year 1	Year 2	Year 3	Year 4	Year 5	

	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
17a-1. Is the fiber a buried/aerial or undersea application?	0	Buried and Aerial	Buried/Aerial	Buried/Aerial						
17a-2. Number of strands deployed	0	0	0	432						
17a-3. Number of miles of buried fiber deployed	0	0	0	2.36						
17a-4. Number of miles of aerial fiber deployed	0	0	0	0						
17a-5. Estimated capacity of fiber (i.e. throughput)	0	0	0	0						
17a-6. Deployment cost per mile of buried fiber optics	\$0.00	\$0.00	\$0.00	\$68,330.07						
17a-7. Deployment cost per mile of aerial fiber optics	\$0.00	\$0.00	\$0.00	\$0.00						
17a-8. Total Spent on Buried Fiber Deployment this reporting period	\$0.00	\$0.00	\$0.00	\$161,258.97						
17a-9. Total Spent on Aerial Fiber Deployment this reporting period	\$0.00	\$0.00	\$0.00	\$0.00						
17a-10. Total spent on Fiber Deployment this reporting period	\$0.00	\$0.00	\$0.00	\$161,258.97						
17a. Fiber Optic Based ***, Long Text Responses and File Uploads										
Current Period (Year 2, Period 2)										
17a-11. Please provide any additional information about the Fiber Optic deployment (200 words or less)	Deployment cost includes administrative, permits, engineering, material and construction costs. The costs within this section only include the fiber that has been installed.									
17a-12. Please provide the digital mappings (e.g., CAD, Revit, KMZ, KML) for the new aerial fiber and buried fiber equipment installed during this reporting period.	File(s) uploaded for digital mappings: BF-STA13-TSS63.kml									



17c. Satellite ***	Year 1		Year 2		Year 3		Year 4		Year 5	
	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
17c-1. What satellite provider is being used?	N/A	N/A	N/A	0						
17c-2. What is the estimated capacity of the satellite link (i.e. throughput)?	0	0	0	0						
17c-3. What is the associated cost to use this satellite service?	\$0.00	\$0.00	\$0.00	\$0.00						
17c. Satellite ***, Long Text Responses and File Uploads										
Current Period (Year 2, Period 2)										
17c-4. Please provide any additional information about the Satellite deployment (200 words or less)	0									
17c-5. Please provide the digital mappings (e.g., CAD, Revit, KMZ, KML) for the satellite network accessed during this reporting period.										

Certifications
18. Please provide certification evidencing compliance with Federal labor and employment laws along with the requirements of Infrastructure Investment and Jobs Act and Middle Mile Grant Program, for the bi-annual period for which this report is being filed.
I certify that ComEd has not received any judgments or findings that ComEd is in violation of any federal labor or employment law, or the requirements of the Infrastructure Investment and Jobs Act and Middle Mile Grant Program, for the bi-annual period for which this report is being filed.
19. Please provide certification evidencing compliance with the Build America, Buy America Act. The Build America, Buy America Act requires that all of the iron, steel, manufactured products (including but not limited to fiber-optic communications facilities), and construction materials used in the project or other eligible activities are produced in the United States unless a waiver is granted.
Build America Buy America (BABA) only applies to “non-Federal entities” receiving Federal financial assistance for an infrastructure project under Section 70912(4) of the Infrastructure Act. For-profit organizations are not considered non-Federal entities per OMB M-22-11. ComEd is a for-profit entity, and is thus not considered a non-Federal entity.  <b>File Uploaded:</b> MMG Inventory Report_01.24.24 OCC FINAL_ComEdMMG_04282025.xlsx



20. I certify to the best of my knowledge and belief that this report is correct and complete for performance of activities for the purposes set forth in the award documents.	
20a. Typed or Printed Name and Title of Authorized Certifying Official:	Beata Okruta
20b. Signature of Certifying Official:	Beata Okruta
20c. Telephone (area code, number and extension):	
20d. Email Address:	Beata.Okruta@ComEd.com
20e. Date:	05/21/2025