



COMMUNICATIONS DIVISION

Substantial Completion Guidance

June 2026

Awardees must be current with required reporting including Monthly Construction Progress Reports and Quarterly and Annual Reports. Information in these reports may be used by the California Public Utilities Commission (CPUC) Communications Division to determine whether a project has reached substantial completion.

1. US Treasury substantial completion guidance

The US Treasury Capital Projects Fund specifies that projects “must reach substantial completion before December 31, 2026.” “Substantial completion is defined as the date for which the Project can fulfill the primary operations that it was designed to perform, delivering services to end-users. At substantial completion, service operations and management systems infrastructure must be operational.” [Guidance for the Coronavirus Capital Projects Fund](#).

2. CPUC substantial completion evaluation

The CPUC Communications Division evaluates whether projects have reached substantial completion. This evaluation includes whether a project provides service, to how many locations, and other project information such as construction reporting. This demonstrates that service operations are in place and the management systems infrastructure is operational.

For projects using models that connect customers late in the project timeline (such as infrastructure owner networks contracting with separate service providers), accepted Optical Time Domain Reflectometer (OTDR) test results to demonstrate end-to-end connectivity of fiber path, and a valid fiber network may be sufficient. OTDR tests can be considered, along with other project information and construction reporting, as a demonstration of substantial completion.

3. Substantial completion is not the same as “completed” project status

The CPUC and US Treasury require a completion report. This is triggered by projects that report a project status of “Completed” on the quarterly report to indicate that all grant funded activities are complete. Substantial completion is separate and distinct from the designation of a project as “completed.” Projects can, and generally will, reach substantial completion before reporting “Completed” status.

For additional details, see “Instructions for Submitting Completion Reports” on pages three through five of the [Quarterly Report Guidance and Frequently Asked Questions](#) (May 2026).



4. Awardees must complete projects and submit completion reporting to receive final payment

At project completion, awardees must submit completion reports prior to receiving the final payment. Projects must be completed, including final testing, before the reported grant end date.

To receive final payment, awardees must submit:

- a) A completion report within 90 days of completion of the project. See, e.g., Federal Funding Account Decision Appendix A pages A-25 to A-27. Also see [Quarterly Report Guidance and Frequently Asked Questions](#) (May 2026) for instructions on submitting completion reports.
 - a. Be prepared to provide actual values reflecting the specific details of deployed infrastructure and connected locations.
- b) Final payment request
- c) All required reports must be accepted and in compliance before payment requests will be processed.

5. Awardees must notify the CPUC if a project cannot be completed by the project end date

Projects must be completed, including final testing, before the grant end date. If the grantee cannot complete the project within the (generally 18 to 24-month) timeline, the awardee shall notify the Commission in writing as soon as it becomes aware that it may not be able to meet the timeline. Awardees should review the Administrative Manual for guidance on submitting amendment requests.

The Communications Division will look more favorably on requests for a project end date extension for projects that have already documented substantial completion.