

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer	
1 Issuer's name	2 Issuer's employer identification number (EIN)
Exelon Corporation/Constellation Energy Group, Inc.	23-2990190/52-1964611
3 Name of contact for additional information	4 Telephone No. of contact
Thomas R. Boin	312-394-8811
5 Email address of contact	6 Number and street (or P.O. box if mail is not delivered to street address) of contact
Tom.Boin@exeloncorp.com	10 South Dearborn Street, 48th Floor
7 City, town, or post office, state, and Zip code of contact	8 Date of action
Chicago, IL 60680-5398	March 12, 2012
9 Classification and description	10 CUSIP number
Exchange of Constellation shares for Exelon shares in merger	210371100
11 Serial number(s)	12 Ticker symbol
N/A	CEG
13 Account number(s)	
N/A	

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ On March 12, 2012, Bolt Acquisition Corporation, a wholly-owned subsidiary of Exelon Corporation, merged with and into Constellation Energy Group, Inc., and Constellation Energy Group, Inc. became a wholly-owned subsidiary of Exelon Corporation. Pursuant to the merger, each Constellation Energy Group shareholder received 0.93 shares of Exelon common stock for each share of Constellation Energy Group stock owned at the time of the merger. Cash was paid in lieu of fractional shares. The above-referenced closing date is the relevant date for measuring each Constellation Energy Group shareholder's ownership interest in Constellation Energy Group and the values of Exelon and Constellation Energy Group common stock.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ Each Constellation Energy Group shareholder's aggregate basis in the shares of Exelon common stock received in the merger will equal that shareholder's aggregate basis in the shares of Constellation Energy Group common stock surrendered in the merger. This includes such shareholder's basis in any fractional share of Exelon common stock the shareholder is deemed to receive. Any Constellation Energy Group shareholder receiving a fractional share of Exelon common stock after applying the applicable share ratio (0.93 shares) is deemed to have received the fractional share of Exelon common stock in exchange for Constellation Energy Group common stock and to have had such fractional share redeemed by Exelon for cash.

The aggregate basis in the Exelon share(s) received in the exchange generally will equal the aggregate basis in the corresponding Constellation Energy Group share(s) that were surrendered in the exchange, reduced by the basis allocated to fractional shares, if any.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ As of the closing date, each share of Exelon common stock had a value of \$39.81 and each share of Constellation Energy Group common stock had a value of \$37.02. A Constellation Energy Group shareholder's aggregate basis in the Exelon shares received equals that shareholder's aggregate basis in the Constellation Energy Group stock surrendered in the merger. To compute the basis in the share(s) of Exelon stock received in the merger, a former Constellation Energy Group shareholder would divide the basis in the corresponding Constellation Energy Group share(s) surrendered in exchange therefor by 0.93.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ **Section 354 and Section 358 of the Internal Revenue Code provide for the result described on lines 15 and 16 above.**

Blank lined area for providing details for question 17.

18 Can any resulting loss be recognized? ▶ **A Constellation Energy Group shareholder will not recognize loss as a result of the merger, except for any cash received in lieu of a fractional share of Exelon stock, in certain circumstances.**

Blank lined area for providing details for question 18.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ **The relevant date for purposes of determining tax basis and related information is March 12, 2012, the date on which the merger became effective. The corresponding tax year is the relevant tax year for such determinations.**

Blank lined area for providing details for question 19.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here Signature ▶  Date ▶ 4/24/2012

Print your name ▶ **Thomas D. Terry, Jr.** Title ▶ **VP and General Tax Officer**

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.