

Clause Reference	Proposed Draft	IndiGrid Comments / Suggestion	NLDC remarks
Clause 4.2.3	RLDC shall concur all intra-regional outage for below 400kV level.	May be modified to 'below and till 400kV level'.	Incorporated as per the RPC approved outage planning procedure.
Clause 4.3.3	During the approved shutdown of line/ICT, any other work by the concerned agencies to be carried out only after getting the code of RLDC/NLDC.	Require clarification on whether this clause highlights or encourages for taking the opportunity shutdown by the associated agency (other than the outage availing agency) to reduce the shutdown period for the year.	Incorporated as per the RPC approved outage planning procedure.
Clause 4.4 (vi)	In case shutdown is extended beyond one day, then utility should approach to respective OCC forum for consent/approval with proper reason and justification of delay with a copy to RLDCs/NLDC or as per outage procedure approved in RPCs. Extension of shutdown will be allowed only after obtaining consent from respective OCC.	May be modified as below – In case shutdown is extended beyond one day and up to three days, then utility should approach for consent/approval with proper reason and justification of delay to RLDC/NLDC with a copy to RPC. RLDC/NLDC would take appropriate decision considering the grid situation with intimation to RPC. Any extension beyond 3 days, would require approval from RPC. Such extension shall only be	This is clause 4.4 (vii) rather (vi) Extension of any shutdown beyond approved time period may affect the stakeholders. Ex: - shutdown extension of Champa Kurukshetra HVDC will require curtailment of TTC/ATC, so stakeholders will have to plan their portfolio accordingly. Further to make Outage planning procedure uniform in all the regions to the extent possible, it is requested that all the

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		applicable for original shutdown only for one time (one extension).	extension of shutdown beyond one day should be approved by RPC only.
Clause 4.4 (x)	Shutdown of all line reactors should be planned along with line to optimize the overall outage of the element.	NLDC / RLDC provide the list of line for which the Line reactor shutdown will be allowed wherever line shutdown is not required as per the system study. For overcompensated lines, shutdown of line reactors may be allowed without availing shutdown of line.	The matter has already been taken up with CTU. Till CTU clarification on subject matter, all the line reactors shall be considered as part of line and their shutdown shall be clubbed with outage of line.
Clause 5.4.7	During planned Shutdown of grid elements when both ends owned by different licensees, no opportunity shutdown code will be issued from NLDC. Utility may be requested to obtain work permit mutually from other substations end.	1. Require clarification on whether this clause highlights or encourages for taking the opportunity shutdown to reduce the shutdown period for the year. Additionally, it is important to include the aspect of coordinating with the other associated agency to prevent multiple outages during minor maintenance work. The only viable option is to avail the opportunity shutdown, which will help prevent multiple outages	Same matter has been already discussed in Clause 4.3.3

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		<p>availed for attending the minor maintenance tasks.</p> <p>2. In addition to the mentioned clause, it may be requested to add a clause explicitly urging the outage availing agency to give consent for availing opportunity outages to the other affected entity, thus avoiding multiple outages of the same transmission element.</p> <p>3. IndiGrid respectfully requests the inclusion of guidelines for accessing the opportunity-based shutdown process. This addition would help prevent multiple transmission element outages which are availing for attending the minor shutdown related issues propose throughout the year.</p>	
Clause 5.4.13	Lines opened on high voltage may be charged after 7-10 days to check healthiness of the same.	Also, Bus reactor need to be included in many cases we have seen that the Bus Reactor was under outage from more than 4-6 month.	Incorporated in Operating procedure.

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		<p>Timelines have to be decided for Bus Reactor also if required.</p> <p>Also include the provision for availing the shutdown during the voltage regulation period for doing the minor maintenance related activities, and this shutdown period should also be considered as deemed available.</p>	<p>All indent of planned shutdown should be as per outage planning procedure.</p>
<p>Clause 5.8.2</p>	<p>Violation or non-compliance message (as applicable) shall be issued in case of persistent deviation of ICT/line flow as per format Annexure-III(b)</p>	<p>Similarly, such non-compliance message should also be issued for violation of (n-1) criteria</p>	<p>Already in practice. Same can be find in annexure III.</p>
<p>Clause 7.1.2</p>	<p>All the users shall ensure the grid voltage level to be maintained above limits during steady and transient conditions during switching and post fault scenario.</p>	<p>May be modified to 'within limits'.</p>	<p>Incorporated.</p>