

# Preparing the 2021 EU ETS MSR Review and the Road to Greater EU Climate Ambition

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# This paper

- Evaluate options for 2021 review with focus on raising ambition
- Raising ambition is at the core of current policy debate
  - national level: implement demand-reducing or cancellation policies, price floor
  - EU level: reinforce companion or non-ETS sector policies, **ETS review**
  - Parry (2019, EER):  $\uparrow$  EUA prices create larger welfare gains (Pareto improv)
- ETS review: changes in LRF & MSR (rate, thresholds, cancellation)
  - these elements interact + hinge on firms' behavior (horizon, responsiveness)
  - (model: other policies embedded in yearly revised EUA demand forecasts)
- Plug & play analysis based on: **Emissions Trading with Rolling Horizons**
  - competitive intertemporal ETS model under uncertainty with supply control
  - firms can utilize rolling horizon and have bounded responsiveness to control
  - RH reconciles 2008-17 bank dynamics w/ implicit discount rates (better on price)
  - perform detailed analysis of 2018 EU ETS reform

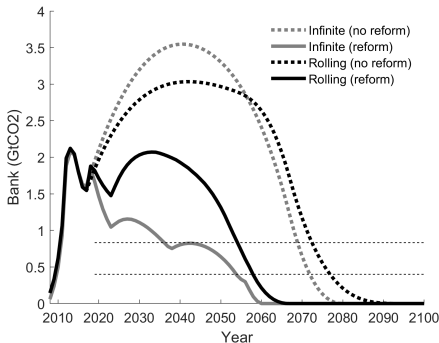
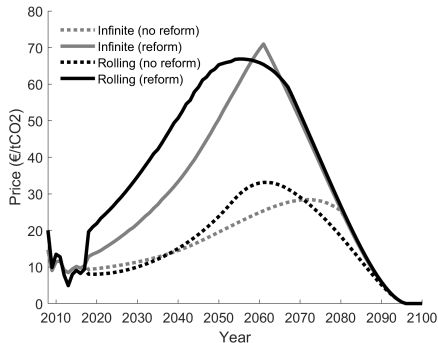
# Modeling framework

- Usual intertemporal ETS model in discrete time  $t = 1, 2, \dots$  with ▶ more
  - stochastic future baseline emissions (Borenstein et al., 2019)
  - representative firm approach (Rubin, 1996; Cantillon & Slechten, 2018)
  - unlimited banking, limited borrowing (non-linearity à la Deaton & Laroque)
  - minimize expected NPV of costs & quasi Hotelling's rule  $p_t - \beta \mathbb{E}_t\{p_{t+1}\} \geq 0$
  
- Supply-side control via MSR: supply schedule is endogenized
  
- Representative firm utilizes infinite or **rolling horizon** (Goldman, 1968)
  - RH: optimize over  $h$  years given realistic supply and demand forecasts + only implements date- $t$  optimal outputs and moves to  $t + 1$  with updated forecasts
  
- Key quantity for firm: expected cumulative abatement effort **over horizon**
  - interplay between decisions in equilibrium and MSR actions over time
  - zero **responsiveness**: firm discovers MSR impacts each year w/o anticipation
  - full **responsiveness**: firm perfectly perceives and accounts for interplay
    - implement fixed-point approach in spirit of Lucas & Prescott (1971)

# Calibration

- Rich variety of observed trading and compliance behaviors ▶ more
  - autarkic compliance via banking & borrowing, active non-compliance entities
  - difficult to elicit firms' degree of and horizon for intertemporal optimization
  - various risk and managerial preferences to handle compliance and trading
  - rolling horizons are a reality (std mgt process, fut maturities, reg uncertainty)
  
- Lack of conclusive evidence → Friedman's black box type of approach
  - infinite vs rolling horizons in how well they replicate 2008-17 outcomes
  - calibrate resultant of all firms' behaviors with usual representative firm model
  
- Two-step calibration in spirit of standard least squares MLE ▶ more
  - parametrize historical and forecasted supply and demand conditions ▶ more
  - infinite:  $h = \infty^*$   $r = 7.06\%$  vs rolling:  $h = 12y$  and  $r = 3\%^*$
  - RH reconciles bank dynamics with implicit discount rates (+better on price)
    - ▶  $r \approx 7\%$  in line with general returns on risky assets (Jordà et al., 2019)
    - ▶  $r \approx 3\%$  central value for rates implied from futures' yield curves

# Infinite vs rolling horizons (in status quo)

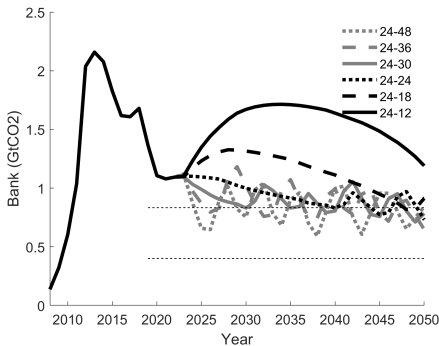
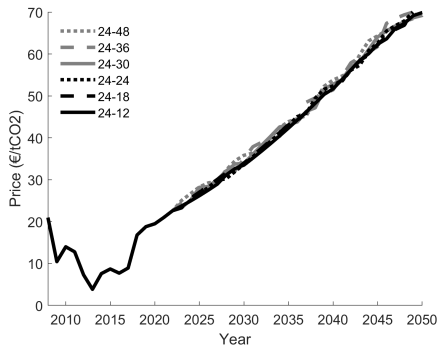


- Case with cancellation mechanism and full responsiveness of firms
  - reform impacts depend on firms' behavior (horizon and responsiveness)
  - 2018 price jump partly recovered by a rolling horizon
  - cumulative cancellations: 5 (infinite) vs 10 (rolling) GtCO<sub>2</sub>
  - in [WP](#): decompose impacts of (interaction between) LRF ↑, MSR, cancellation

# Preparing and informing the 2021 review process

- From now on: assume firms use RH and exhibit full responsiveness
- Review elements include changes in
  - cap linear reduction factor (LRF)
  - MSR intake rate (and fixed re-injection quantity)
  - MSR thresholds' positions (height, width) and slopes
- Cancellation mechanism taken as granted though need be enshrined
  - small impacts with RH: re-injections are far off, mostly outside horizon
- Evaluate changes in isolation: combinations are likely but numerous
- Focus on MSR-induced resilience to future shocks (2<sup>nd</sup> reform objective)
- Assume that agreement on review takes time (as for 2015-18 reform)
  - regulatory changes are implemented in 2024 and maintained thereafter
  - voted/agreed upon in – and thus anticipated from – 2023

# Changing the intake rate



- A higher intake rate magnifies threshold effects of a trigger mechanism
  - does not bring stability to market: conditions harder to gauge for participants
  - interacts with banking motives: drag vs restoring force around upper threshold
  - prices slightly higher on average, but more volatile
  - slightly larger cumulative cancellations: 8.71 (12%) to 9.15 (48%) GtCO<sub>2</sub>

# Changing the intake rate

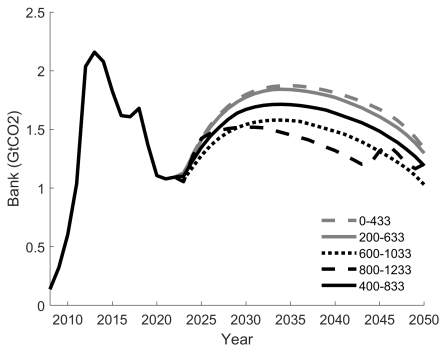
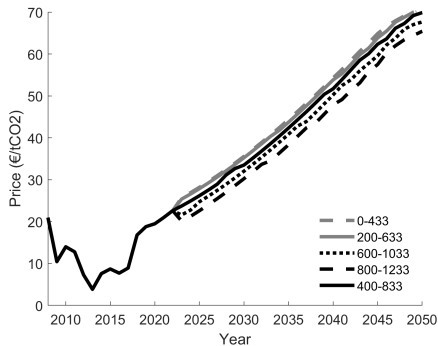
## Annual MSR intakes with different intake rates



- Cumulative MSR intakes are similar but time profiles vary:
  - low rate: annual intakes quite stable over time
  - high rate: annual intakes more erratic (roller coaster) + shorter intake period

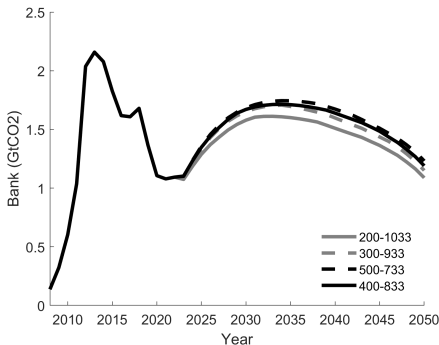
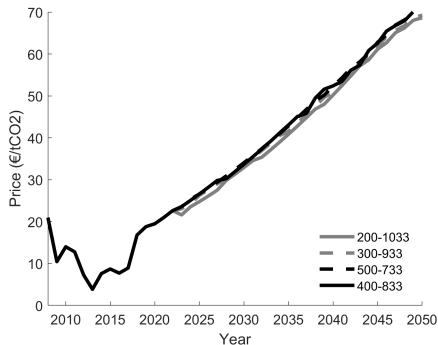


# Changing the height of the thresholds



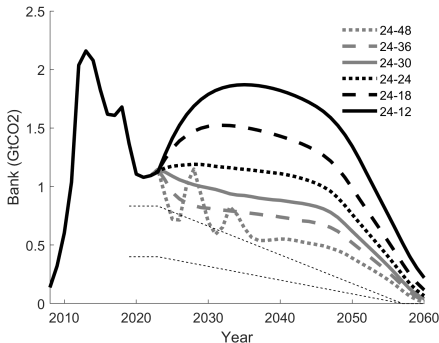
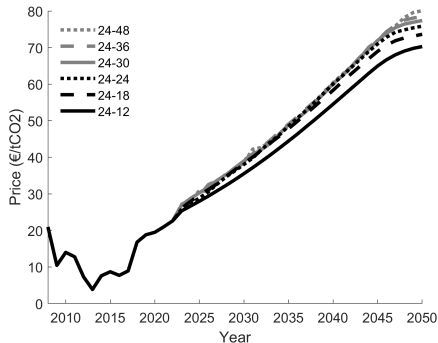
- Higher thresholds imply lower prices and smaller cumulative removals
  - height of upper threshold matters the most with cancellation mechanism
  - if one seeks to curtail TNAC, implement high thresholds!
  - prices ordered by decreasing upper threshold height (range of 5-10€/tCO<sub>2</sub>)
  - cumulative cancellations can vary more: 6.86 (1233) to 9.26 (433) GtCO<sub>2</sub>

# Changing the width between the thresholds



- SIMILAR STORY: position of upper threshold matters the most
  - similar ordering of price and banking paths (less visible)
  - cumulative cancellations vary less: 8.04 (1033) to 8.85 (733) GtCO<sub>2</sub>

# Declining thresholds

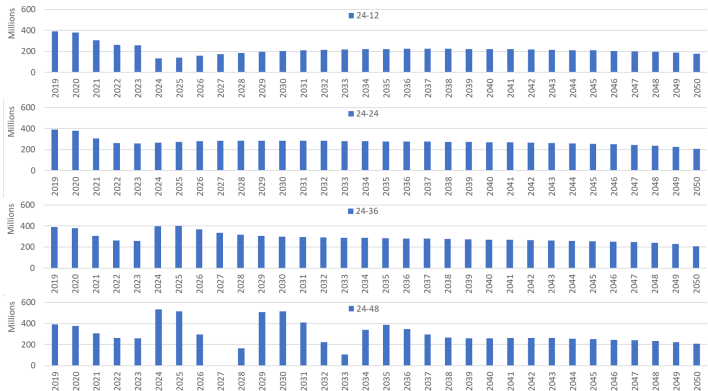


## ■ Declining thresholds stabilize impacts of higher intake rates

- accompany the natural (bell-shaped) trajectory of the bank
- TNAC never falls within the desired range but is 'stabilized'
- relative to constant thresholds (and fixed re-injection quantity):
  - ▶ prices are higher and less volatile for all intake rates
  - ▶ cumulative cancellations are larger: 9.27 (12%) to 11.1 (48%) GtCO<sub>2</sub>

# Declining thresholds

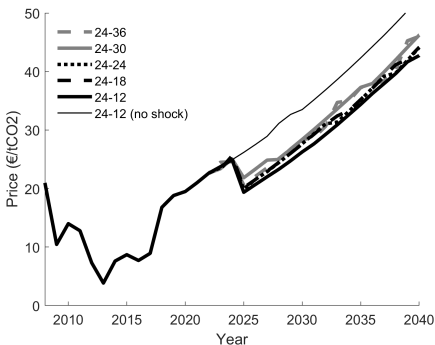
## Annual MSR intakes with different intake rates and declining thresholds



- Annual MSR intakes quite stable over time (except for 48% at first)
  - similar in size across intake rates: higher rate compensated by lower bank

# MSR-induced resilience to future 'imbalances'?

Unanticipated permanent negative demand shock (-150MtCO<sub>2</sub> from 2025)



- Shock not entirely cushioned + price not 'put back on track'
  - price response and shock absorption not monotonic in the intake rate
    - ▶ price drop maximal with 12% (5.6€) minimal with 30% (3.2€)
    - ▶ crucially hinges on TNAC the year before the shock occurs (relevant indicator?)
  - modest cumulative absorption: 10-17% of cumulative shock
  - see [WP](#) for small one-off shocks preserving intake cut-off dates ▶ results

# How to raise (ETS) ambition?

- General remark: How to express targets?
  - annual targets are tricky/misleading given intertemporal trading  
e.g. reaching 0 emission in 2050 requires that the cap be zero before 2050
  - even more so true now that the MSR is in place
  
- Two ways of raising ambition within ETS perimeter
  - higher *Linear* Reduction Factor
  - reinforced MSR (augmented intake rate and thresholds)
  
- Not equivalent when firms utilize rolling horizons (inter alia)
  - transitional stringency as important as cumulative stringency if not more
  - MSR frontloads abatement effort: more effort perceived early on w.r.t.  $LRF_{eq}$
  - WP: 2018 reform  $LRF_{eq}=2.95$  but not least-cost (+2.2% w.r.t. MSR) ▶ results
  
- LRF-MSR interaction: complements or substitutes?
  - ambiguous: higher LRF induces shorter banking (and thus MSR intake) period

# Interaction between LRF and MSR design

Intake rate	LRF	Emissions (Mt)			Intakes end	Removals (Gt)
		2030	2040	2050		
No MSR	2.20	1,281	848	419	–	0
	4.15	882*	405	148	–	0
12%	2.20	1,109	674	285	2055	8.71
	2.96	882*	401	145	2048	8.51
	2.20 <sup>d</sup>	1084	644	282	2057	9.27
	2.94 <sup>d</sup>	882*	409	149	2048	8.60
24%	2.20	1,106	666	279	2051	8.89
	2.89	882*	390	120	2044	9.51
	2.20 <sup>d</sup>	1054	587	232	2057	11.0
	2.63 <sup>d</sup>	882*	399	142	2051	11.3
36%	2.20	1,098	676	280	2050	8.97
	2.83	882*	419	129	2045	9.77
	2.20 <sup>d</sup>	1040	588	208	2057	11.6
	2.62 <sup>d</sup>	882*	382	118	2052	11.8

# Thanks for listening

Email: [S.Quemin@lse.ac.uk](mailto:S.Quemin@lse.ac.uk)

Link to LSE WP: [Emissions Trading with Rolling Horizons](#)



# Emissions Trading with Rolling Horizons

## Model

- Competitive intertemporal ETS under uncertainty with supply control
- Firms can use rolling horizon and have bounded responsiveness to control

## Calibration

- Parametrization to EU ETS: Supply, demand and market design
- Aim: Match observed annual price and banking levels over 2008-17
- RH reconciles observed bank with implicit discount rates (+better on price)

## Simulations (EU ETS Reform)

- 2018 price jump consistent with RH and MSR (irresp. of cancel)
- MSR reduces cumulative cap (even w/o cancel) up to 10GtCO<sub>2</sub> under RH
- Cancellations reduce efficiency loss due to MSR (improvement under RH)
- MSR punctures less of the 'waterbed over time' under RH (but for longer)

# Model Structure

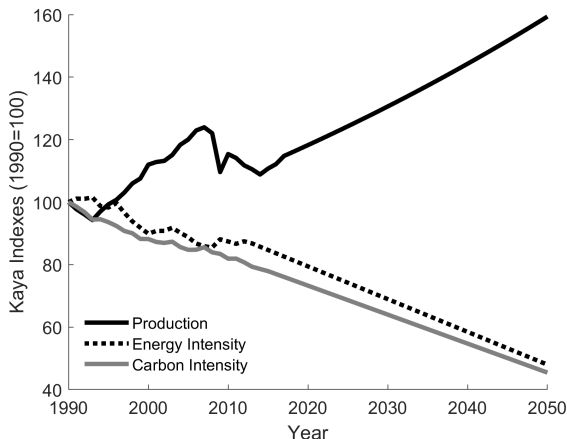
- Intertemporal permit market: compliance required at times  $t = 1, 2, \dots$ 
  - with unlimited banking and limited borrowing (up to next year's free alloc)
- Competitive trading and firms' production decisions are ignored
  - decentralized market equilibrium  $\equiv$  joint cost minimization (Rubin, 1996)
- Stochasticity: future baseline emissions are uncertain
  - business cycles, reach of companion policies (e.g. Borenstein et al., 2019)
- Arbitrage  $\rightarrow p_t - \beta \mathbb{E}_t\{p_{t+1}\} \geq 0$  in equilibrium (quasi Hotelling's rule)
  - minimization of expected NPV of abatement costs
  - limited borrowing  $\rightarrow$  non-linearity, no closed-form sol. (Deaton & Laroque)
- Representative firm has infinite or rolling horizon (RH) alternatively
  - RH to deal with uncertainty (use of realistic forecasts) [▶ Literature](#) [▶ EU ETS evidence](#)
  - Spiro (2014), van Veldhuisen & Sonnemans (2018) with exhaustible resource







# Baseline CO<sub>2</sub> Emissions (Demand)



$$CO_2 \text{ emissions} = \text{Production} \times \frac{\text{Energy}}{\text{Production}} \times \frac{CO_2 \text{ emissions}}{\text{Energy}}$$



# Future Demand Forecasts

- Future baseline forecast  $\equiv$  deterministic part of AR(1) process [graph](#)

$$\hat{u}_{t+1}^t = \varphi(1 + \gamma_t)u_t + (1 - \varphi)\bar{u}_{t+1}^t$$

- persistence:  $\varphi = 0.9$  (Fell, 2016)
- expected future GDP growth rate  $\gamma_t$  (past: EC forecasts; future: 2%/y)
- trend  $\bar{u}$  declining over time, in line with companion policies

Forecast period	Climate Energy Package	$\bar{u}_{2050}/e_{2008}$	$\bar{u}_t = 0$ in
2008-2013	CEP#1	57.5%	2115
2013-2017	CEP#2	50.7%	2105
2018-2100	Reinforced CEP#2	39.7%	2096

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# Ex-Post Calibration (2008-17)

- Assume  $C_t'' = c > 0$  (recall: linear MACC intercept declining over time)
- Two-step calibration in spirit of std. least squares MLE: [▶ graphs](#)
  - calibrate  $r$  given  $h$  or  $h$  given  $r$  to replicate observed bank
  - calibrate  $c$  given  $r$  and  $h$  to replicate observed yearly-averaged spot price

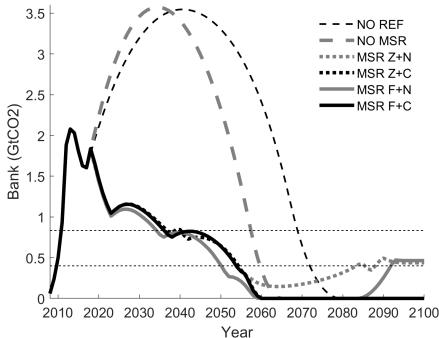
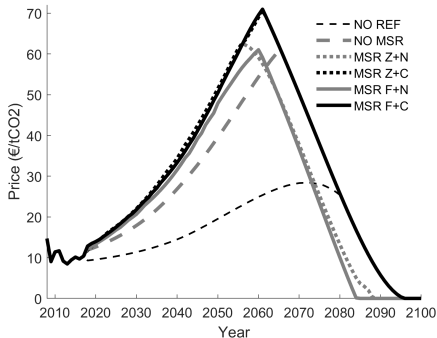
Horizon type	Horizon & discount rate	Marginal abatement cost
Infinite	$h = \infty^*$ $r = 7.06\%$ (std.dev = 52.9 MtCO <sub>2</sub> )	$c = 5.53 \cdot 10^{-8}$ €/tCO <sub>2</sub> <sup>2</sup> (std.dev = 4.04 €/tCO <sub>2</sub> )
Rolling	$h = 13$ $r = 3\%^*$ (std.dev = 64.9 MtCO <sub>2</sub> )	$c = 5.72 \cdot 10^{-8}$ €/tCO <sub>2</sub> <sup>2</sup> (std.dev = 2.12 €/tCO <sub>2</sub> )

- RH reconciles observed bank with implied discount rates (+better on price)
  - $r \approx 7\%$  in line with general returns on risky assets (Jordà et al., 2019)
  - $r \approx 3\%$  central value for rates implied from futures' yield curves [▶ data](#)

# Appraising the EU ETS Reform

- Evaluate reform impacts on price/bank paths & cumulative emissions
  - up to 2100 (market terminates before, all permits used well before)
  
- Reform impacts with infinite vs. rolling horizons
  - No reform/status quo: LRF of 1.74% (NO REF)
  - Without MSR: sole increase in LRF from 1.74 to 2.20% (NO MSR)
  - With MSR but without cancellations:
    - ▶ with full (MSR F+N) or zero responsiveness (MSR Z+N)
  - With MSR and with cancellations:
    - ▶ with full (MSR F+C) or zero responsiveness (MSR Z+C)
  
- Focus on cumulative emissions and cost efficiency
  
- Focus on cumulative emissions and exogenous abatement

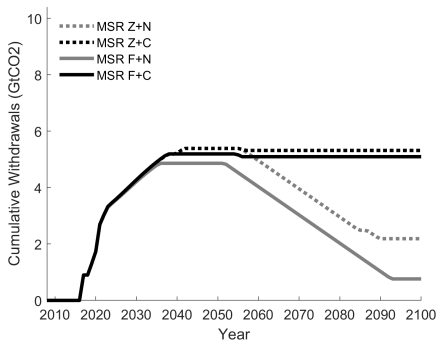
# Reform Impacts with Infinite Horizon



## ■ Reform hikes prices and reduces banking

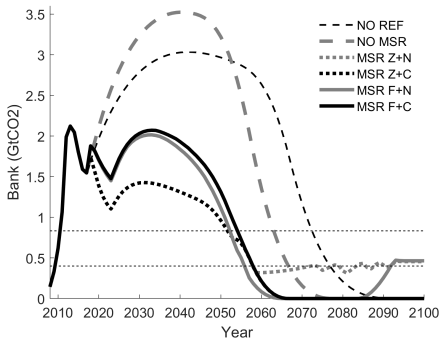
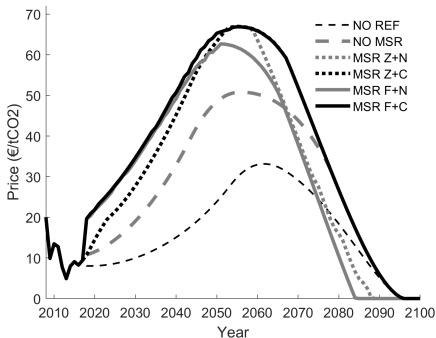
- Small impacts from responsiveness and cancellations
- MSR intakes stop just before 2040 (followed by ~15 years of inactivity)

# Reform Impacts with Infinite Horizon



- Reform endogenizes and reduces cumulative emissions
  - With cancellations: cumulative emissions reduced by 5 GtCO<sub>2</sub>
  - Without cancellations: MSR doesn't have time to empty before market ends

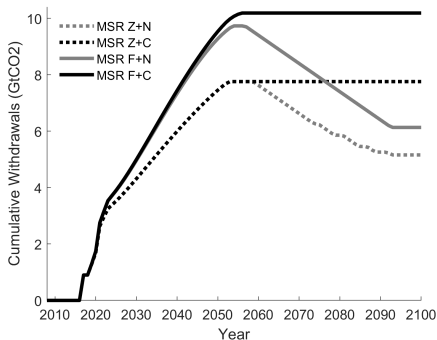
# Reform Impacts with Rolling Horizon



## ■ Reform **further** hikes prices and reduces banking **less sharply**

- Responsiveness has greater impacts than cancellations
- MSR intakes stop just after 2050 + price jump in 2018

# Reform Impacts with Rolling Horizon



- Reform endogenizes and **further** reduces cumulative emissions
  - Cumulative emissions reduced by 6 (w/o cancel) to 10 GtCO<sub>2</sub> (w/ cancel)
  - Larger MSR intakes due to responsiveness coupled with RH

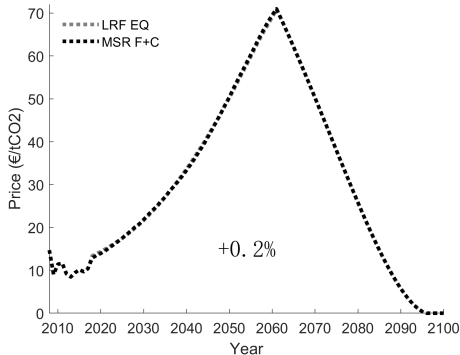
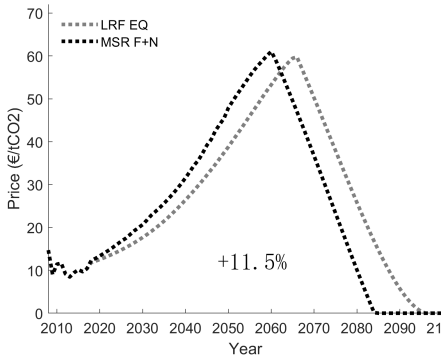
# Focus on Cumulative Emissions & Cost Efficiency

- Reform → cumulative emissions cap becomes a market outcome
  - $LRF_{eq}$ : yields same cumulative emissions w/o MSR as w/ MSR (ref: 2.20%)
  - Efficiency loss: additional total compliance costs under MSR w.r.t.  $LRF_{eq}$ ?
  - (Interaction: are LRF increase and MSR independent reform features?)

Horizon	Respons.	Cancel.	$LRF_{eq}$	Efficiency loss	Interaction
Infinite	Zero	Off	2.28%	9.0%	16.4%
		On	2.48%	0.2%	4.6%
	Full	Off	2.18%	11.5%	11.1%
		On	2.46%	0.2%	3.1%
Rolling	Zero	Off	2.50%	9.0%	11.7%
		On	2.70%	0.6%	0.6%
	Full	Off	2.59%	7.9%	1.7%
		On	2.95%	-2.2%	-5.2%

# Focus on Cumulative Emissions & Cost Efficiency

- Reform → cumulative emissions cap becomes a market outcome
  - $LRF_{eq}$ : yields same cumulative emissions without MSR as with MSR
  - Equilibrium price paths under MSR w.r.t.  $LRF_{eq}$ ?

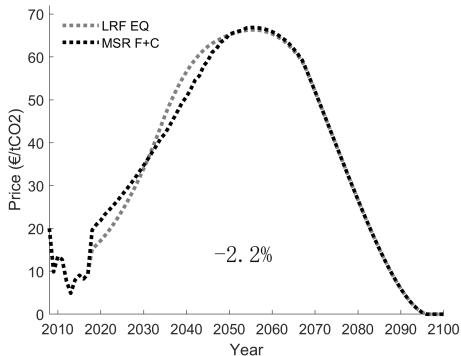
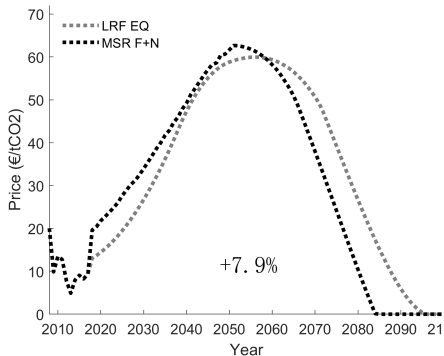


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# Focus on Cumulative Emissions & Cost Efficiency

- Reform → cumulative emissions cap becomes a market outcome
  - $LRF_{eq}$ : yields same cumulative emissions without MSR as with MSR
  - Equilibrium price paths under MSR w.r.t.  $LRF_{eq}$ ?



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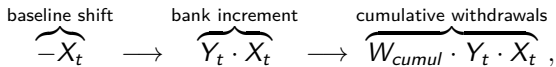
# Focus on Cumulative Emissions and Exogenous Abatement

- Reform → non-price driven emission reductions can be made permanent
  - i.e. partial puncture of a 'waterbed effect over time'
  - long-term impacts on cumulative emissions of one-shot marginal shifts in baseline emissions (small enough to avoid changes in cut-off intake date)

Horizon	Respons.	Cancel.	Year of shift				
			2020	2025	2030	2035	2040
Infinite	Zero	Off/On	53%	42%	33%	19%	6%
	Full	Off	49%	38%	24%	0%	0%
		On	54%	43%	32%	12%	0%
Rolling	Zero	Off/On	14%	14%	15%	17%	20%
	Full	Off	22%	24%	25%	27%	28%
		On	23%	24%	26%	27%	28%

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# Focus on Cumulative Emissions & Exogenous Abatement



Year of shift

Horizon	Share	Year of shift				
		2020	2025	2030	2035	2040
Infinite	$Y_t$	60%	57%	54%	53%	52%
	$W_{cumul}$	90%	76%	59%	23%	0%
Rolling	$Y_t$	24%	28%	31%	34%	40%
	$W_{cumul}$	92%	87%	85%	80%	70%

Note: Case with the cancellation mechanism and full responsiveness.

- $Y_t^{RH} < Y_t^{IH}$ : less room to spread  $X_t$  and higher bank to start with
- $W_{cumul}^{RH} > W_{cumul}^{IH}$ : more time to absorb bank increment

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# Planning with Rolling Horizons (Literature 1)

- The more distant future is more uncertain in terms of
  - possible outcomes, their probabilities and how to incorporate them in planning
- Rolling horizons to deal with increasing uncertainty, informational constraints/requirements and cognitive limitations
  - Agents resort to heuristics or rules of thumb (e.g. Gigerenzer & Selten, 2003)
- Concept of RH first formalized by Goldman (1968), extended to
  - stochasticity and stationarity (Easley & Spulber, 1981)
  - capital accumulation (Kaganovitch, 1985)
  - strategic interactions (Jehiel, 1995)
  - nonlinear model predictive control (Grüne et al., 2015)
- RH = crude but simple way of modeling behavior in face of ambiguity
  - ambiguity aversion with maxmin decision rule (Gilboa & Schmeidler, 1989)
  - sparsity-based bounded rationality (Gabaix, 2014)
  - rational inattentiveness (Reis, 2006; Sims, 2006)

## Planning with Rolling Horizons (Literature 2)

- RH used in production planning and supply chain (Sahin et al., 2013)
  - permits are one factor of production (Zhang & Xu, 2013)
- RH help rationalize quantitative puzzles
  - saving behaviors (Caliendo & Aadland, 2007)
  - social security choices (Findley & Caliendo, 2009)
  - long-run price dynamics of exhaustible resources not conforming to Hotelling's rule (Spiro, 2014; van Veldhuizen & Sonnemans, 2018)
- Rich experimental literature on dynamic decision problems:
  - deviations from rational expectations (Carbone & Hey, 2001)
  - behavioral expectations & adaptive heuristic switching (Hommes et al., 2019)
  - limitations on how far ahead people can plan (Hey & Knoll, 2007)
  - traders myopic (Smith et al., 1988) or use past trends (Haruvy et al., 2007)

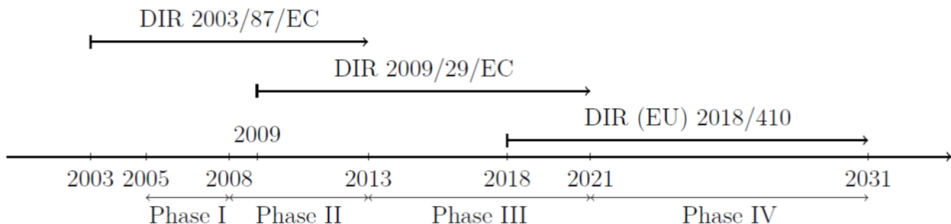
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# Planning with Rolling Horizons (EU ETS)

- Intra-firm constraints restrict reach of intertemporal considerations
  - standard in-house risk management procedures apply
    - power firms partially hedge future prod. up to 3 years (Eurelectric, 2009)
    - beyond hedging target, banking only at much higher rate (Schopp et al. 2015)
  - stockpiling limited by willingness to tie up capital (Dardati & Riutort, 2016)
  - banking justifiable when carbon trading is not one's core activity?
  - hoarding permits can trigger concerns about cornering and manipulation
- Futures markets provide proxies for foresight and discount rates
  - maturities up to 10 years ahead & liquidity quickly ↓ with time-to-maturity
  - discount rates implied from futures' yield curves are 'low' [▶ data](#)
- Regulatory uncertainty: firms may excessively focus on the short term
  - regulation is changing and only set for a dozen years ahead [▶ timeline](#)
  - credibility of the regulator to intervene to 'fix the market' (ETS, RIP?)
  - vagueness of the regulatory language [▶ example:cancellations](#)

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# EU ETS Regulatory Timeline

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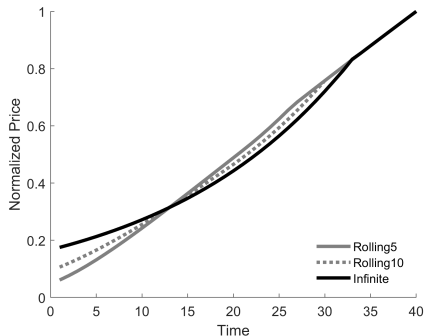
# Market Stability Reserve (Soft Banking Collar)

- From 2019 on: automatically adjusts  $a_t$  based on past banking
  - if  $b_{t-2} > 833$  million:  $0.24 \cdot b_{t-2}$  withheld from auctions (0.12 after 2023)
  - if  $b_{t-2} < 400$  million: 200 million added to auctions (100 after 2023)
  - stock of permits in MSR satisfies complementary dynamics (+initial seed)
  
- In principle: cumulative cap preserved ( $\sim$ auction schedule reshuffling)
  - provided that the MSR has time to release all set-aside permits
  
- From 2023 on: add-on cancellation mechanism breaks neutrality for sure
  - any permits in reserve in excess of previous year's auctions are cancelled
  - endogenizes the cumulative cap: depends on past & future market outcomes
  - regulatory vagueness: validity, should vs. shall vs. will, pending 2021 review

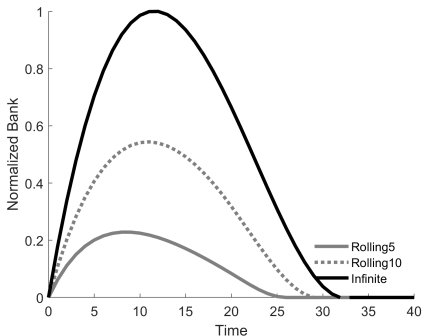


# Infinite vs. Rolling Horizons

- Under perfect foresight, no supply control and yearly binding caps
  - Qualitatively: shorter horizon  $\sim$  larger discount rate

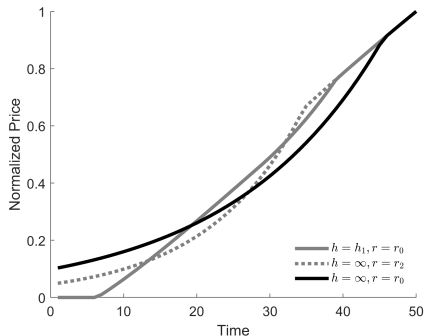
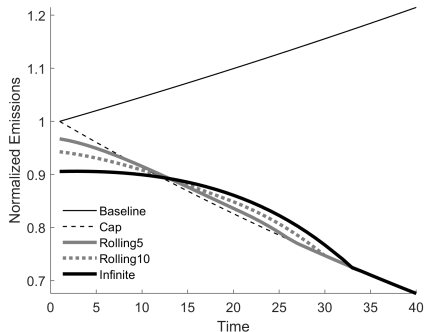


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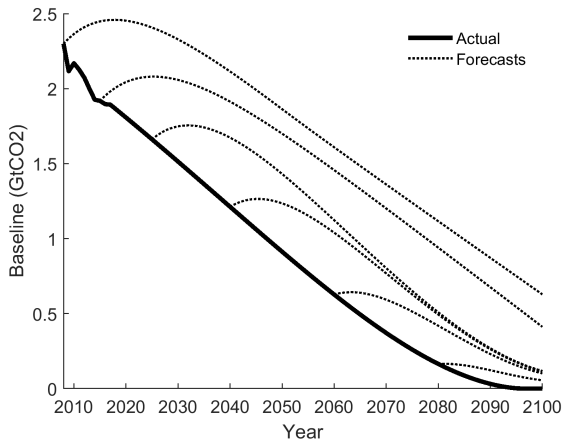
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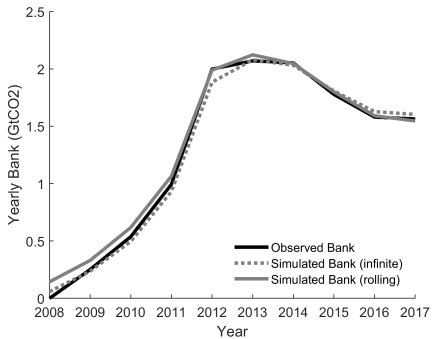
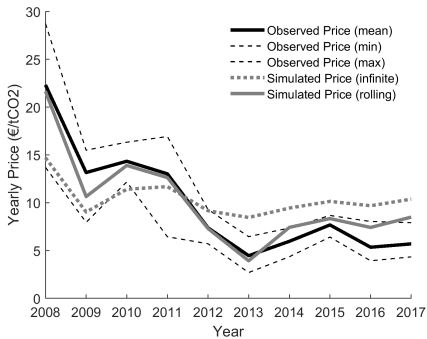


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# Actual Baseline vs. Forecasts



# Calibration Results

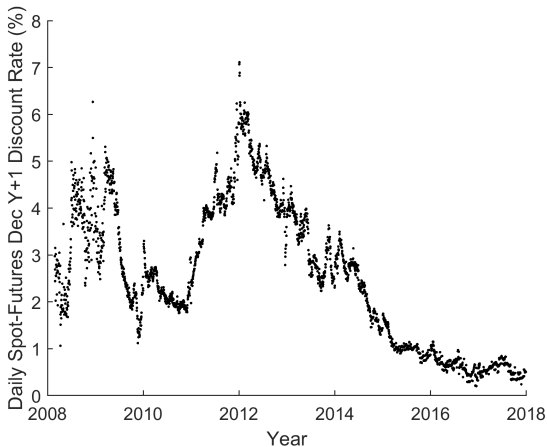
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# Implied Discount Rates (2008-17)

Daily yield curve	Mean	Median	Std.Dev	Min	Max
Fut. Dec Y+1 / Spot	2.4%	2.5%	1.5%	0.2%	7.0%
Fut. Dec Y+1 / Fut. Dec Y	2.9%	2.6%	1.8%	0.3%	8.7%
Fut. Dec Y+2 / Fut. Dec Y+1	3.6%	3.7%	2.0%	0.2%	8.7%
Fut. Dec Y+3 / Fut. Dec Y+2	4.1%	2.5%	2.0%	0.6%	9.2%

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# Yield Curve: Fut. Dec Y+1 / Daily Spot (2008-17)



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