Actions to improve the current implementation of the ETS

• Reduce distortions from new entrant allocation
• Ensure strong price till 2012
• Create market confidence going forward
• Conclusion
New entrant allocation distorts fuel/technology choice

Reduce distortions from allocation
Future new entrant allocation can reduce investment

Equilibrium margin required to fund investment

Reduces future investment thresholds -> reduces revenue streams for today’s investment -> increases today’s investment threshold (and in addition distorts fuel/technology choices …)

Assumptions: Discount rate 10%, Overnight investment cost coal 1000Euro/KW (lowest cost of IEA 2005 survey), New entrant allocation for coal in Germany, 7500h operation per year

Karsten Neuhoff
### Recent data used for allocation to existing facilities – updating prevalent

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These distortions from repeated free allowance allocation can be ranked in a pyramid

- Auction
  - Capacity only: X
  - Capacity by fuel/plant type: X, X
- Output only: X, X
- Output by fuel/plant type: X, X, X
- Emissions: X, X, X, X, X

Impacts
- Increased expenditure on extending plant-life
- Inefficient fuel choice
- Less efficiency improvements

Distortions
- Discourage plant closure
- Distortion biased towards coal
- Shields output from average carbon cost
- Distortion biased towards coal
- Reduce incentives for Efficiency-improving investment

Source: Neuhoff, Keats, Sato 2006
Reduce distortions from allocation

... and we seem to have made little progress moving up


Karsten Neuhoff, 7
Reduce distortions from allocation

And the level of allocation is not trivial


Karsten Neuhoff, 8
Conclusion on free allocation

- Distortions from free allocation strong if there are expectations of continued high allocation post 2012
- Phase out free allocation post 2012
  - Potentially conditional on measures to address international competitiveness for certain sectors

-> Go through state aid assessment

- Free allowance allocation is state aid
- Some can be justified as proportional to cost of transition
- This would likely require committing to no further free allocation post 2012

-> PERFECT
Ensure strong price till 2012

Numerical evidence – projection uncertainty Phase II

- Cap envisaged in NAPII too lax → expected price low → revisit NAPII
- Projections difficult – uncertainty about price likely to remain

Source: Neuhoff, Ferraro, Grubb, Gabel, Keats (Sept 2006)
Also viable in short-term: Auctions with price floor

Coordinated auction with price floor can set floor to allowance price
- Facilitates low carbon investment
- Reduces emissions and thus allowance price

Ensure strong price till 2012

Source: Neuhoff, Ferrario, Grubb, Gabel, Keats (Sept 2008)
Ensure strong price till 2012

Detail – auctions with price floor

• Auctions are viable and simple option for allocation
• Directive allows for up to 10% auctions in 08-12
• We suggest to a coordinated auction with price floor
• Use supplementarity criteria to limit CER inflows
  – if their price too low relative to desired price floor
• Some allowances from auctions will be required
  – thus they determine a price floor
• Price ceiling – difficult to align with Directive
  – price spikes unlikely given current projections
  – flexibility from CERs likely to prevent price spikes

Why is commitment important?

- Investment decisions driven by mid term revenues
- Low Carbon investment often only viable with minimum CO₂ price

Use economic instruments to create market confidence going forward
Use economic instruments to create market confidence going forward

Various instruments complement each other
Example CO₂ price internalisation and technology policy

ETS is no substitute for technology policies (e.g. renewable support)
Use economic instruments to create market confidence going forward

Allow countries to take leadership

- Kyoto framework as basis and target for future convergence
- A country can take leadership with more stringent policies
  - Drives technology, behaviour and institutional change
  - Directly lowers emissions and shifts infrastructure investment
  - Demonstrates viability of policies and competes for leadership
Benefit if countries take leadership

• Direct Carbon savings
  – Direct price effect on demand/input choices
  – Accelerated shift of behaviour
• Direct future Carbon savings
  – Investment in lower Carbon technologies
• Dynamic benefits
  – Accelerated development of technologies
  – Accelerated development of Low Carbon Culture
• Political benefits
  – Example of feasibility facilitates global agreement
  – Competition for leadership

Use economic instruments to create market confidence going forward
Do longer commitment periods facilitate investment?

• Create clarity about framework
• Will it be sufficiently stringent?
• Are we confident we have the right approach?
  – Addressing competitiveness
  – Linking/engaging developing countries
  – Allocation methodology
• Will it be credible?

Use economic instruments to create market confidence going forward
Use economic instruments to create market confidence going forwards

Expected (Ex Ante) and Actual (Ex Post) Total Costs of some UK Policies during 1990-2001

* Upper estimate >£8000 mio.
Does increasing use of banking support price stability?

- Banking can translate short-term shocks into inter-temporal quantity transfers
- We can fix price by defining long-term target price
  - Requires opportunity to commit
  - Requires definition of target price level
- This seems difficult given current information:
  - 85$/tCO₂ Medium damage cost (Stern review)
  - 50?? $/t CO₂ Backstop low Carbon technology
  - 15-30$/t CO₂ Phase II allowance price
  - <5$/t CO₂ credits from avoided deforestation

Other options

- Open market intervention by government
- (Changing) reserve requirements on emitters
- Loans, perhaps with firms bidding interest rates
- Splitting allowances

Using option contracts to create a price floor

- Governments sell option contracts to private parties
- Creates property right, strong enforceability
- Length corresponds to desired commitment, e.g. 15 years
- Investors can call an option:
  - Hands in option + CO₂ allowance
  - Receives strike price, e.g. 15 Euro/t CO₂
- Hedges investment, and also stabilises CO₂ price:
  - Investors will call options if \( p_{\text{CO₂}} < 15 \text{ Euro/tCO₂} \)
    - Reduce supply, pushes up price
  - Governments avoid buying back allowances
    - Restrict issuing allowances to retain scarcity price

Theory of collective action

• **Chang structure of incentives** – increase shared understanding, make links to wider range of benefits, side payments

• **Reciprocity** … repeated game structure helps

• **Frequency of interaction/contacts and transparency** increases cooperation in repeated games

• **Reputation** can play an important role – a leader can create a *positive dynamic* by demonstrating willingness to co-operate … and the actions of the leader have strong influence on the beliefs that others hold about the prospects of cooperation

Quoted from Stern review
Conclusions

• Avoid distortions from allocation
  – No more free allocation post 2012
• Ensure strong price till 2012
  – Stringent caps
  – Consistent JI/CDM limits
  – Allowance auctions with price floor
• Use economic instruments to create market confidence
  – Drives innovation
  – Banking / longer commitment periods difficult
  – Government issued financial option contracts
• More detail on www.electricitypolicy.org.uk/tsec/2