



Actions to improve the current implementation of the ETS

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Karsten Neuhoff
Cambridge University

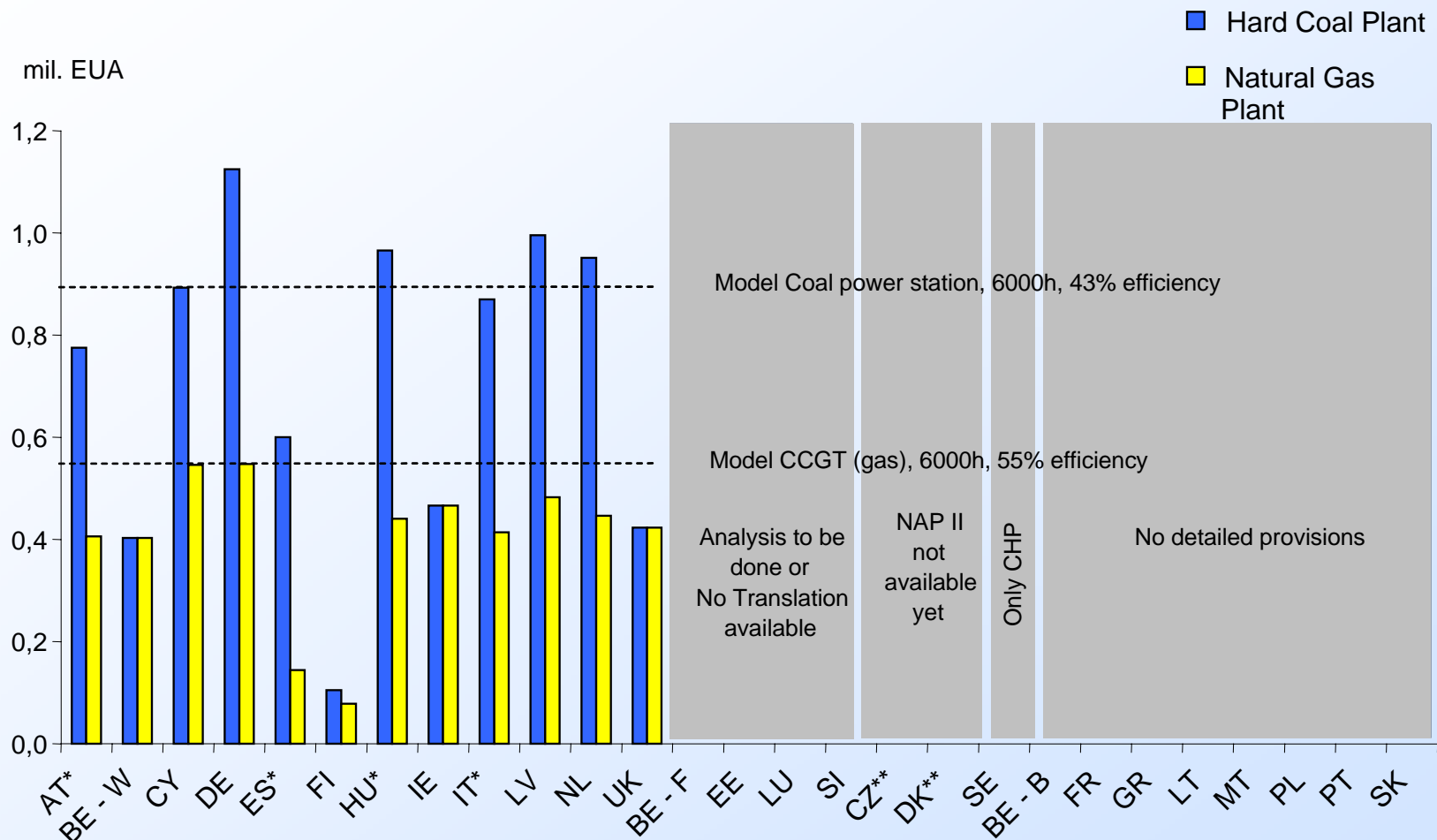
www.electricitypolicy.org.uk/tsec/2

Actions to improve the current implementation of the ETS

- Reduce distortions from allocation
- Ensure strong price till 2012
- Use instruments to create market confidence going forward
- Conclusion

Reduce distortions from allocation

New entrant allocation distorts fuel/technology choice

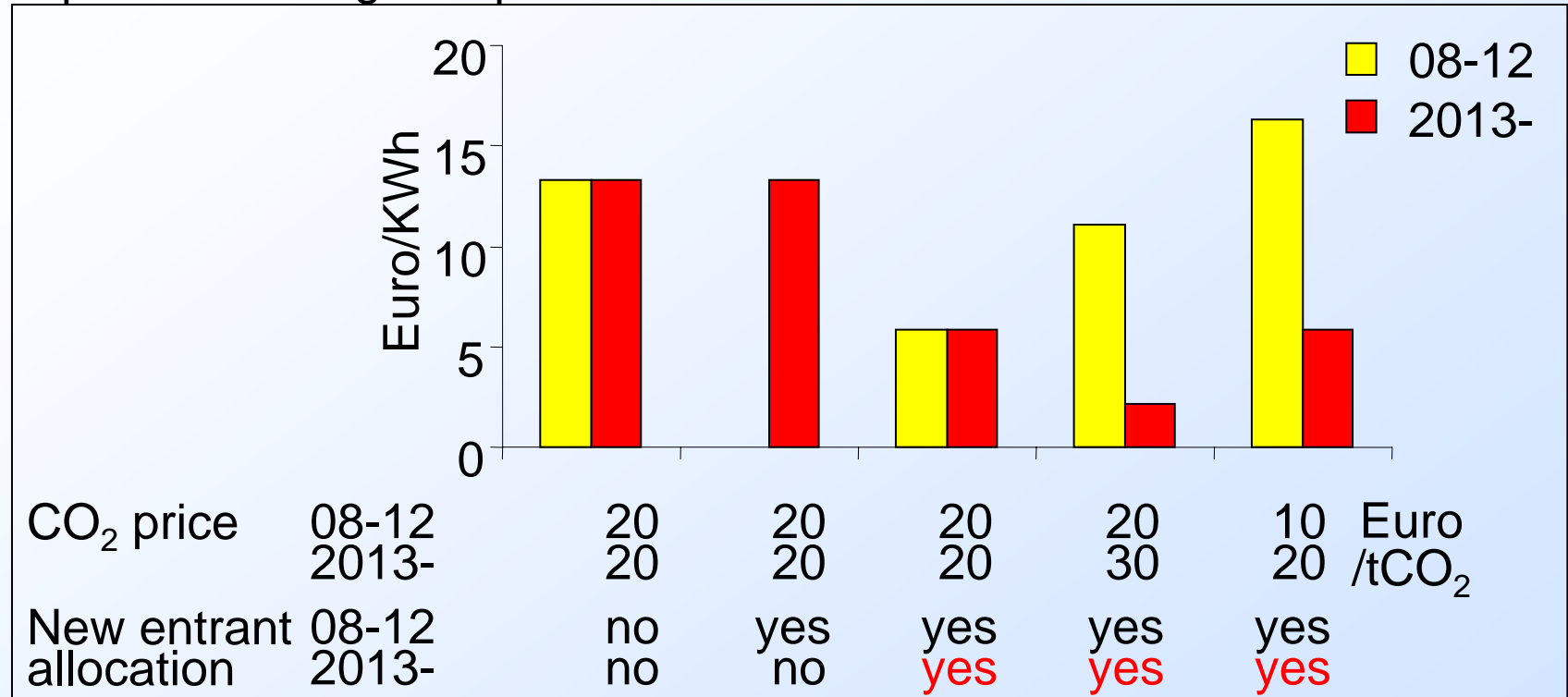


Comparison of National Allocation Plans for the Period 2008-2012, Karsten Neuhoff, Markus Åhman, Regina Betz, Johanna Cludius, Federico Ferrario, Kristina Holmgren, Gabriella Pal, Michael Grubb, Felix Matthes, Karoline Rogge, Misato Sato, Joachim Schleich, Jos Sijm, Andreas Tuerk, Claudia Kettner, Neil Walker

Reduce distortions from allocation

Future new entrant allocation can reduce investment

Equilibrium margin required to fund investment

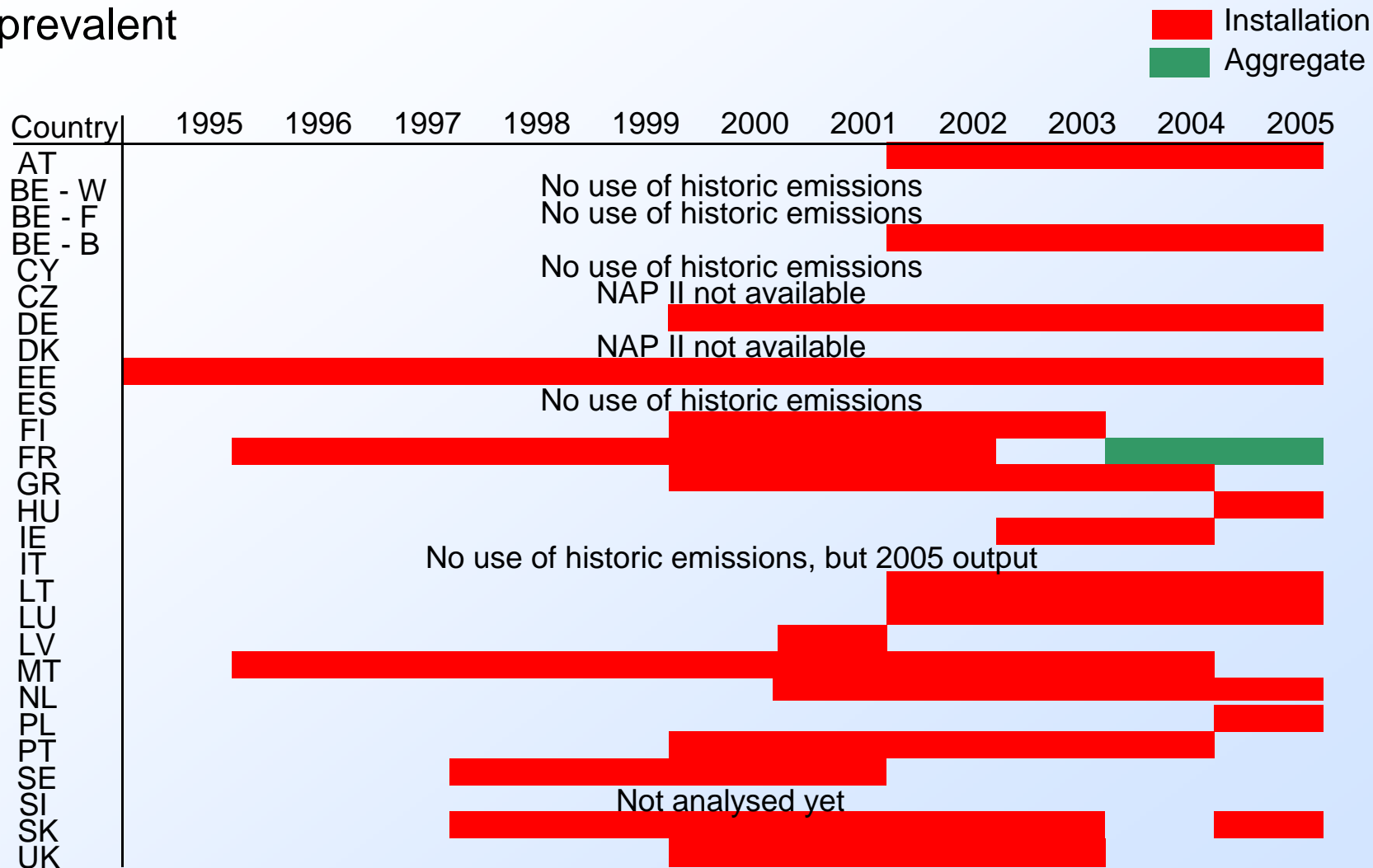


Reduces future investment thresholds -> reduces revenue streams for today's investment -> increases today's investment threshold (and in addition distorts fuel/technology choices ...)

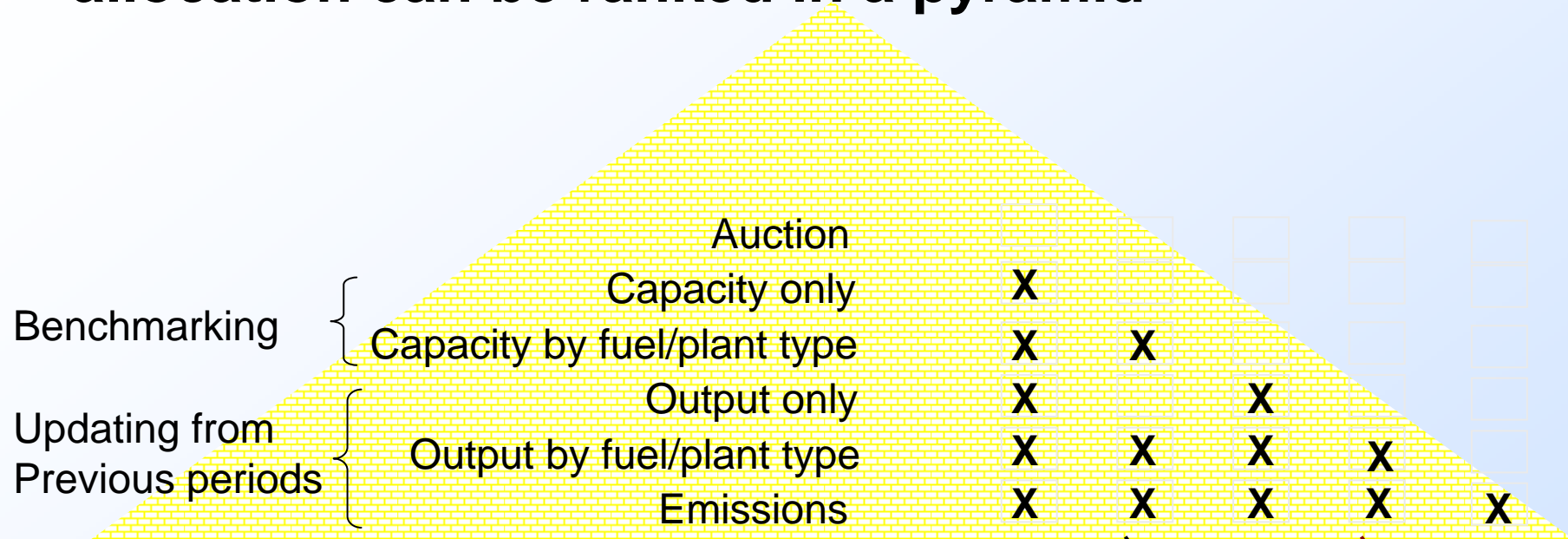
Assumptions: Discount rate 10%, Overnight investment cost coal 1000Euro/KW (lowest cost of IEA 2005 survey), New entrant allocation for coal in Germany, 7500h operation per year
 Karsten Neuhoff, 4

Reduce distortions from allocation

Recent data used for allocation to existing facilities – updating prevalent



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



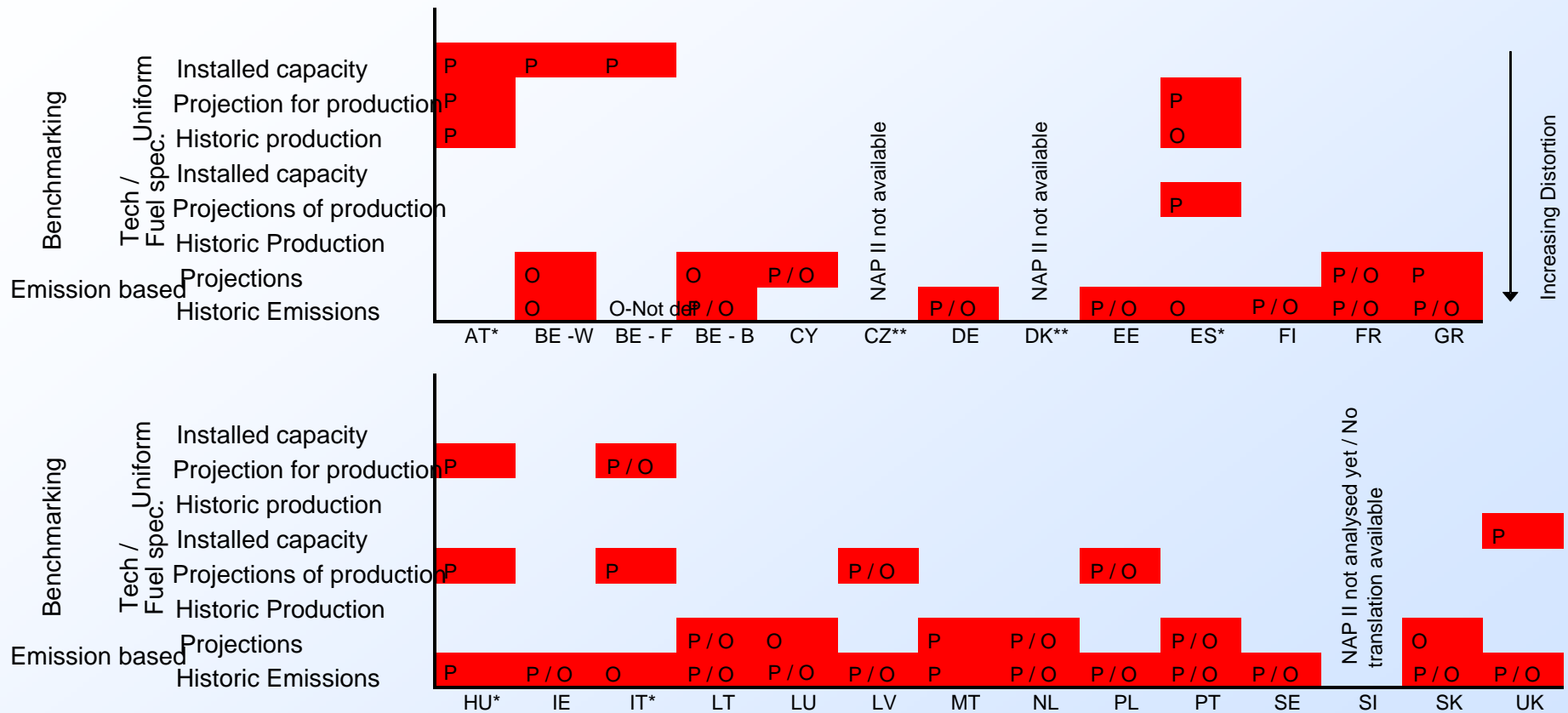
Impacts

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

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

Reduce distortions from allocation

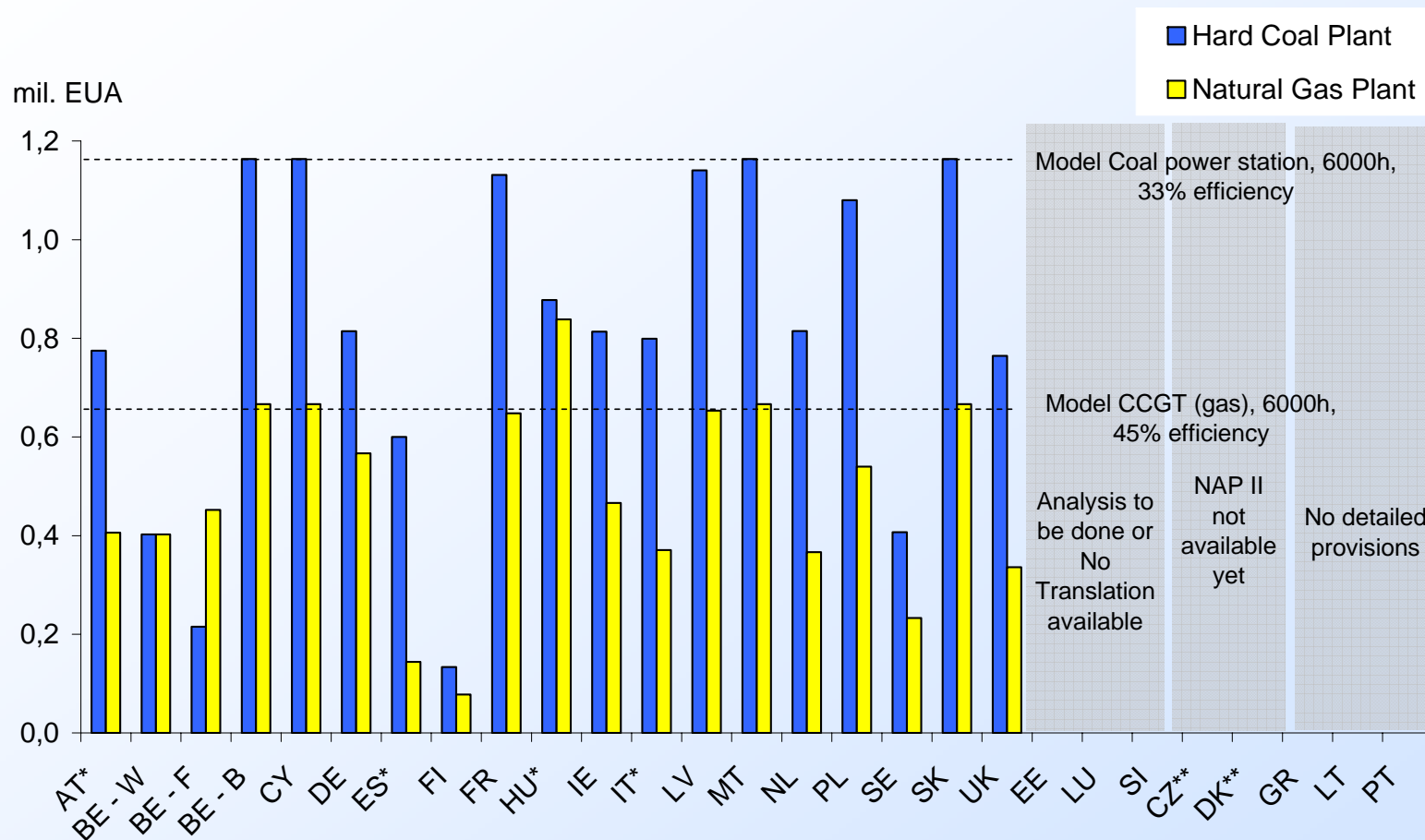
... and we seem to have made little progress moving up



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Reduce distortions from allocation

And the level of allocation is not trivial

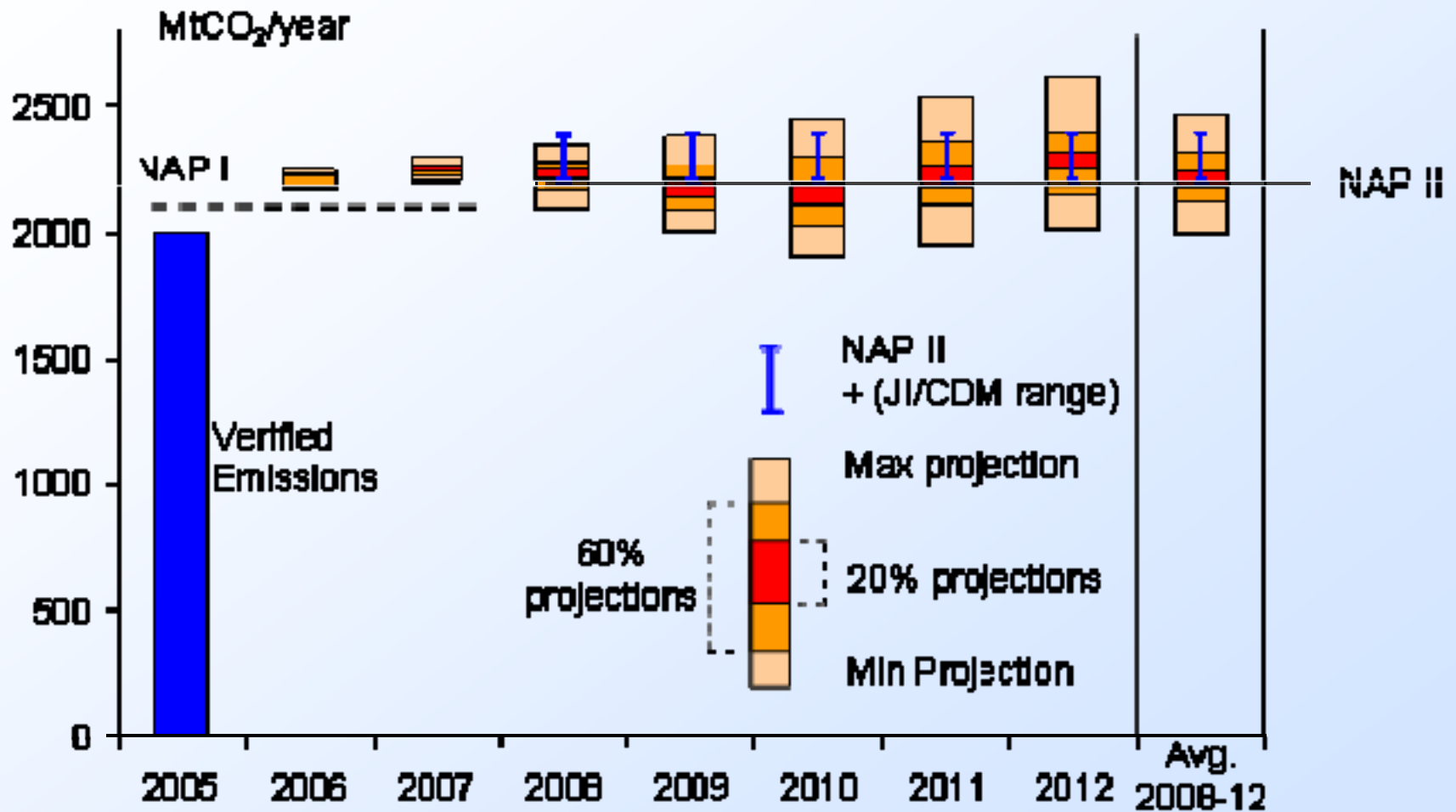


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Conclusion on free allocation

- 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

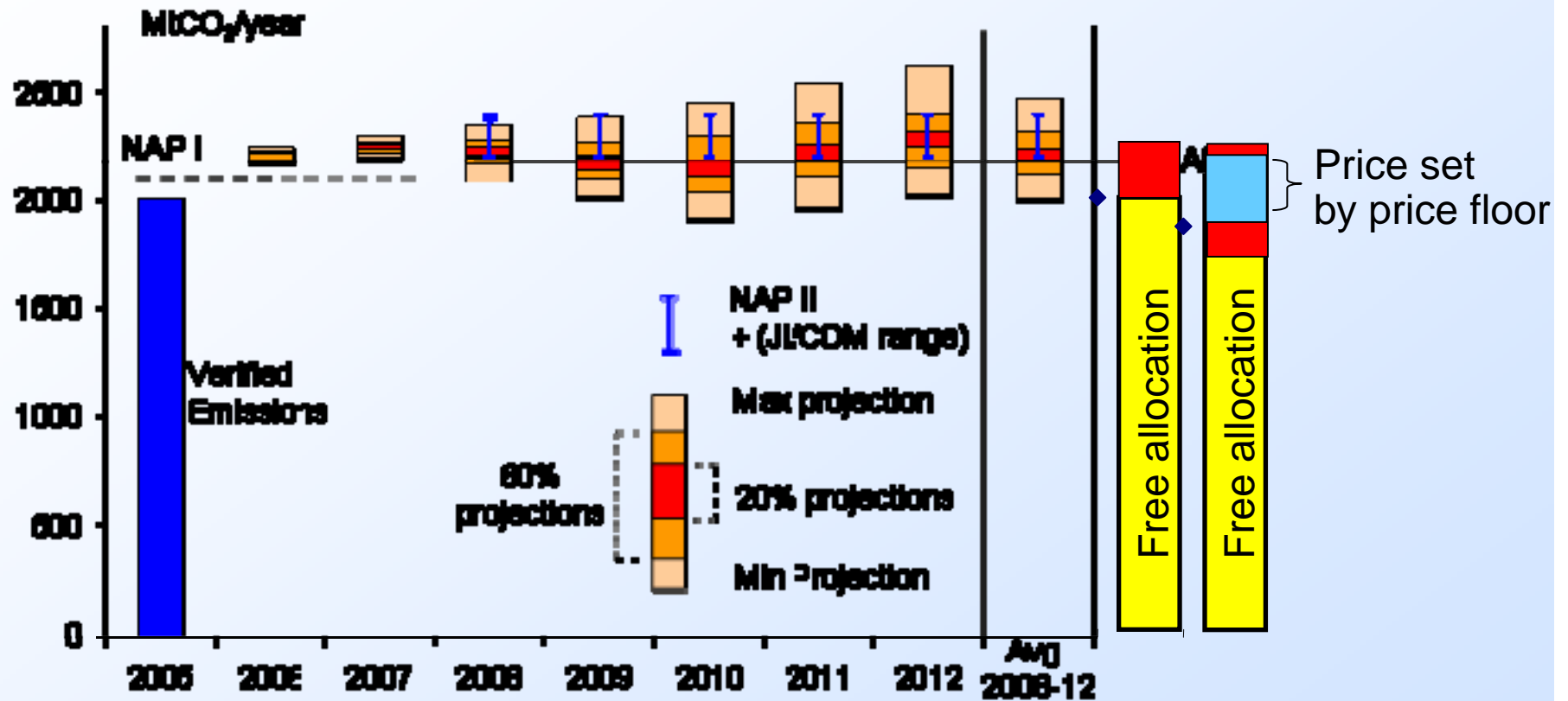
Numerical evidence – projection uncertainty Phase II



Source: Neuhoff, Ferrario, Grubb, Gabel, Keats (Sept 2006)

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

Also viable in short-term: Auctions with price floor



Source: Neuhoff, Ferraric, Ombati, Ombati, Keats (Sept 2008)

Coordinated auction with price floor can set floor to allowance price

- Facilitates low carbon investment
- Reduces emissions and thus allowance price

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 complementarity 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

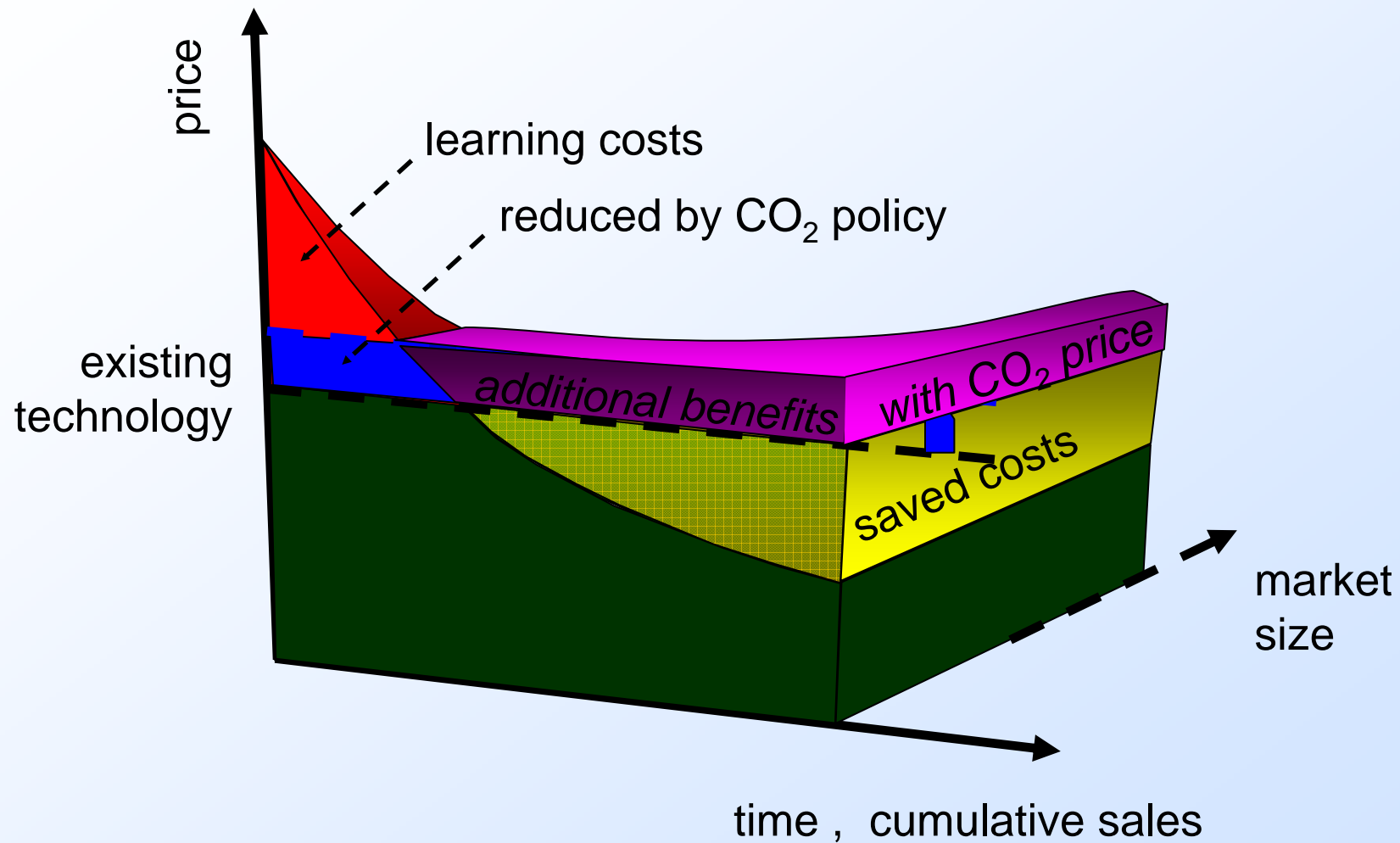
Why is commitment important?



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

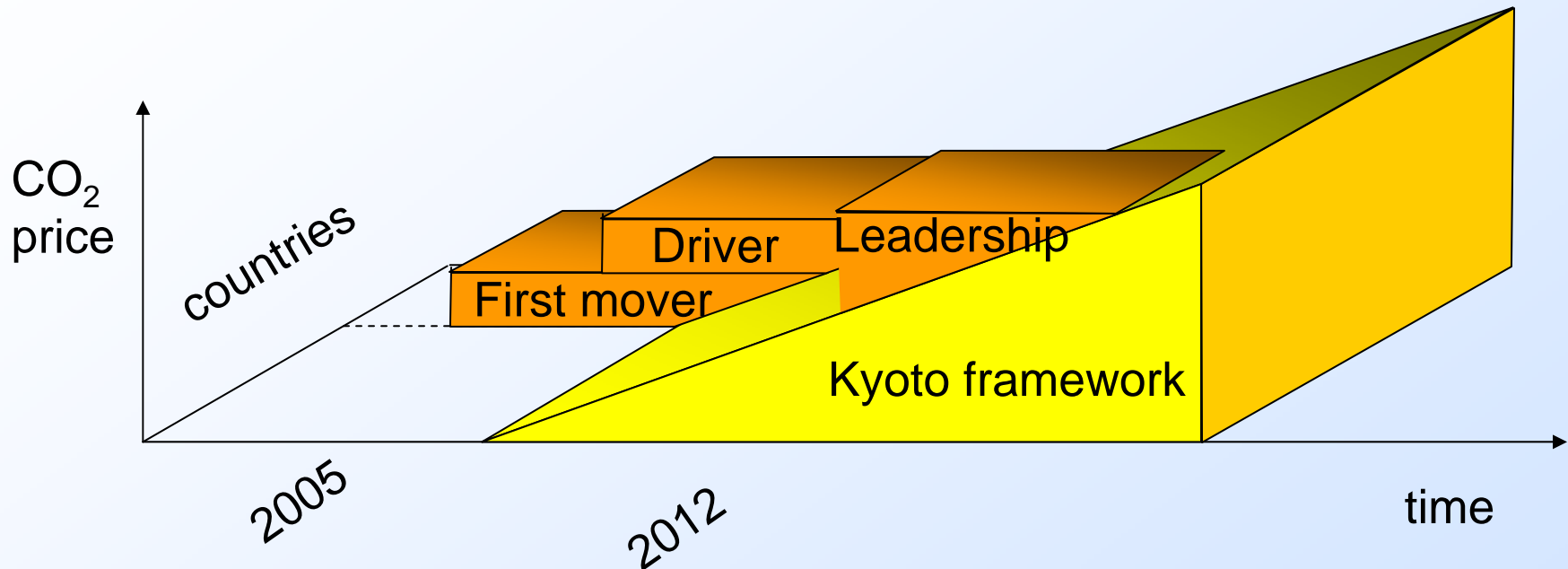
Use economic instruments to create market confidence going forward

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



ETS is no substitute for technology policies (e.g. renewable support)

Allow countries to take leadership



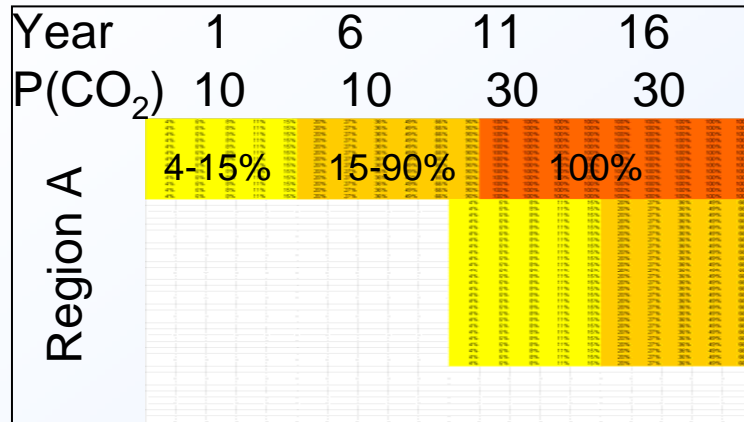
- Kyoto framework as basis and target for future convergence
- A country can take leadership with more stringent policies
 - Drives technology, behaviour and institutional change
 - Directly lowers emissions and shifts infrastructure investment
 - Demonstrates viability of policies and competes for leadership

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

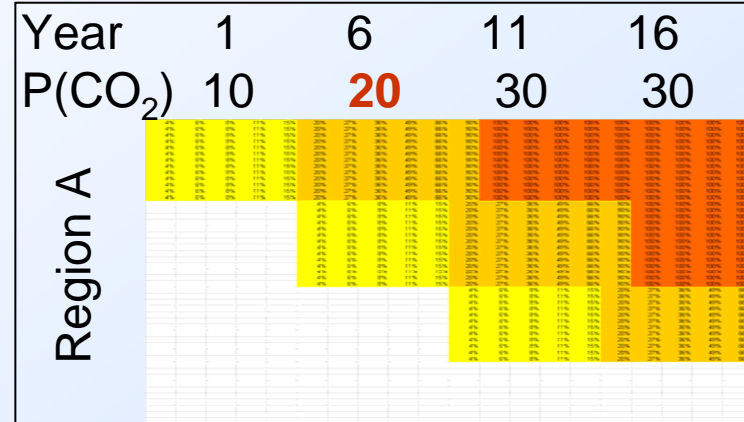
Use economic instruments to create market confidence going forward

Learning by doing model
Level of sectoral decarbonisation

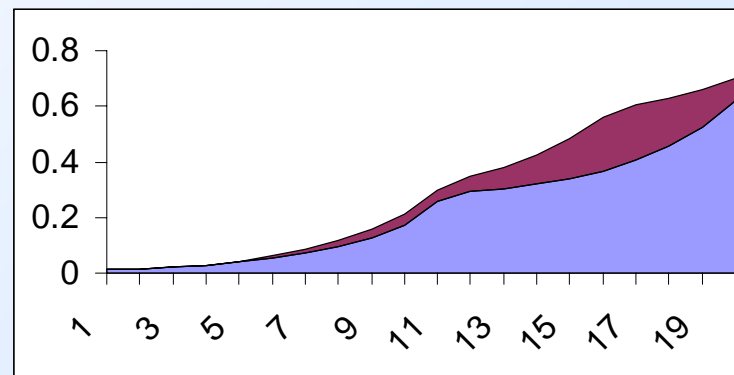


(Not calibrated)

Level of sectoral decarbonisation



Level of global decarbonisation



Model assumptions of previous slide

- Private sector deploys profitable technology
- Initial market volume 4%, Growth rate 30%
- Learning rate 20%, no technology spill over
- Pay-back period 5 years, discount 10%
- Sectors sorted by viability of low Carbon tech.
 - No low Carbon tech viable at $p_{CO_2}=0$
 - All low Carbon tech viable at $p_{CO_2}=38$

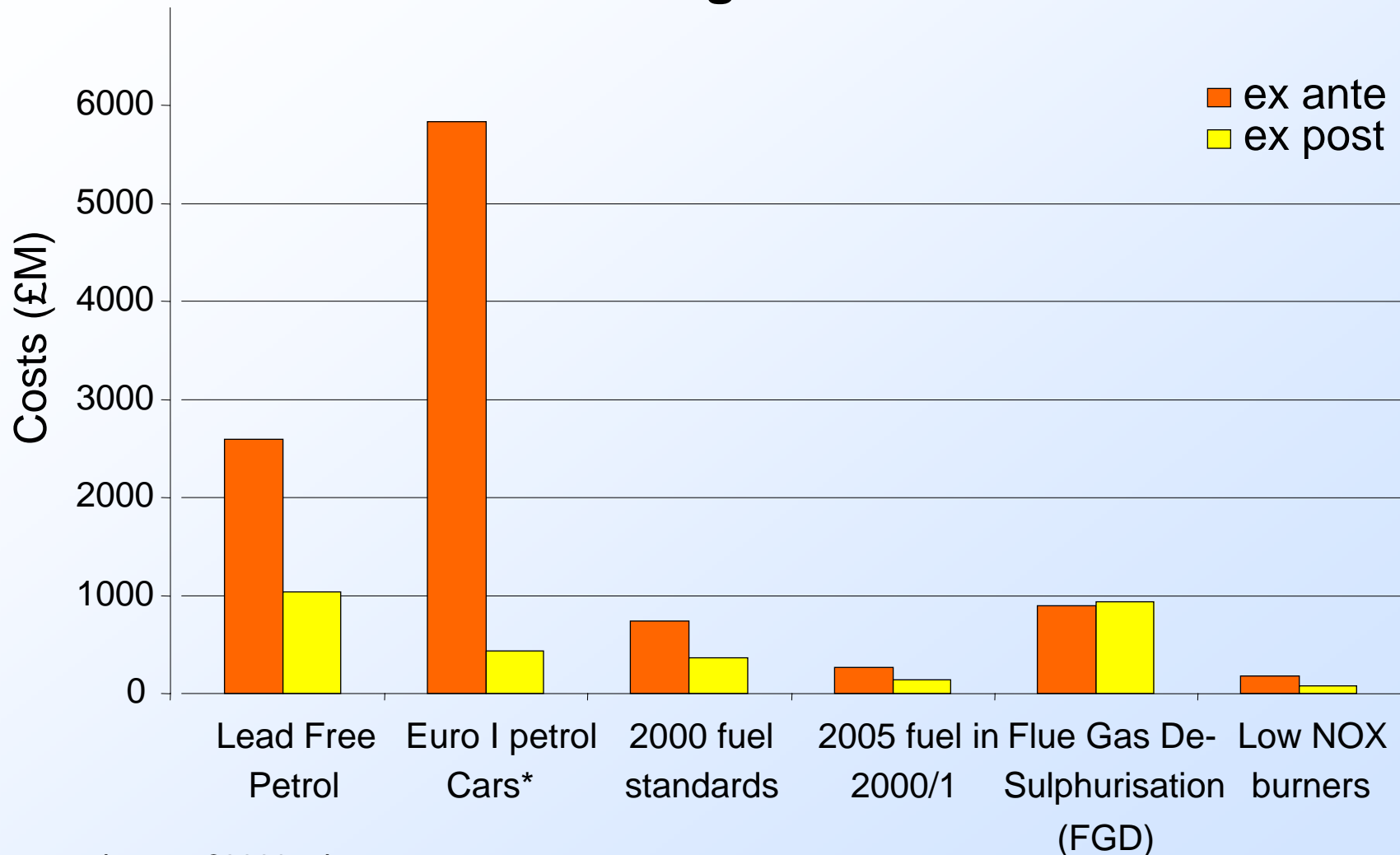
Future work:

- Technology spill over, increases dynamic benefit
- Calibration

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?

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



* Upper estimate >£8000 mio.

Source: AEA Technology Environment, 2005, An Evaluation of the Air Quality Strategy, Report to DEFRA, available at: <http://www.defra.gov.uk/>

Does increasing use of banking support price stability?

- Banking can translate short-term shocks into inter-temporal quantity transfers¹
- We can fix price by defining long-term target price¹
 - 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 $p_{\text{CO}_2} < 15 \text{ Euro/tCO}_2$
 - > Reduce supply, pushes up price
 - Governments avoid buying back allowances
 - > Restrict issuing allowances to retain scarcity price

Theory of collective action

- **Change 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

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