

Environmental Market Design: Analyzing Impact of Regulatory Policy on Certificate Price Dynamics

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(from work with Rene Carmona & Daniel Schwarz...)

(... to work with Warren Powell & Javad Khazaei...)

(...and a bit with Michele Stua)

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Environmental Market Overview

Categories of typical environmental markets:

- Cap-and-trade for carbon allowances (*e.g. EU ETS, California, etc.*)
- Renewable energy certificates (RECs), i.e. green certificates (*e.g. many US states, Norway-Sweden, UK, Australia, India, etc.*)
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A brief summary:

- In cap-and-trade, an allowance is a permit to emit one ton of CO₂, which polluters must submit each year to cover their emissions
- In REC markets, a certificate represents one MWh of electricity generated, needed by utilities to reach a required % of renewables.

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Strong links between these markets, their design and price behaviour!

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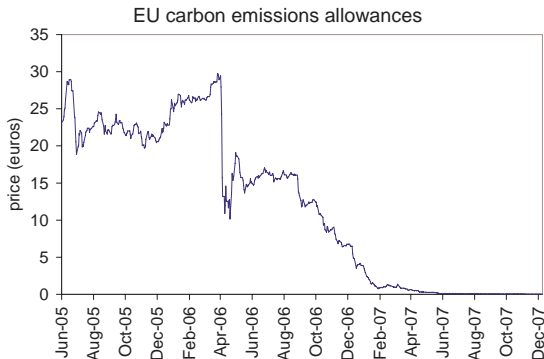
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Hence many interesting research questions emerge, with little literature:

- How to model prices? (and demand or supply)
- Optimal behaviour of participants? (e.g. abatement, new investment)
- Optimal behaviour by regulators? (e.g. interventions)
- Optimal market design?

Carbon Price Modelling

Early work (with limited history) proposed traditional price models like for equities. However, in the first EU-ETS trading period (Phase I, 2005-07):

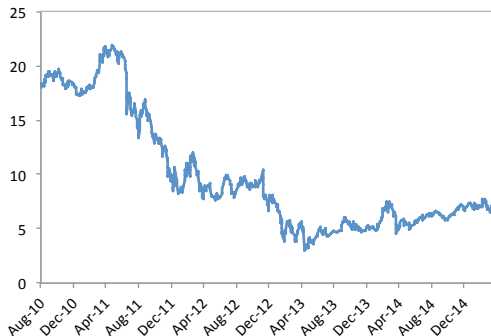


Collapse of prices in 2006-07 was caused by the oversupply of credits, combined with the lack of banking to Phase II.

EU Carbon Prices

In recent years prices have again slumped, due partly to recession (lower than anticipated demand) and long-term political uncertainty.

EU allowance price (Dec 2015 forward)



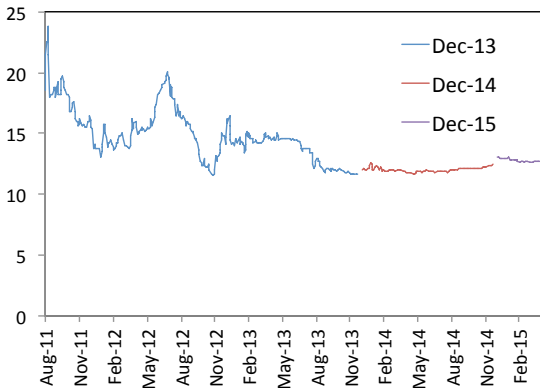
Low prices have led to some attempts to claw back oversupply, and to recent rule changes: the market stability reserve. (see *Taschini et al 2014*)

California Carbon Prices

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The recently formed California (plus Quebec!) market as similarly slipped into a period of oversupply recently, with prices near 'auction reserve' price of about \$10-\$11 dollars (grows with inflation).

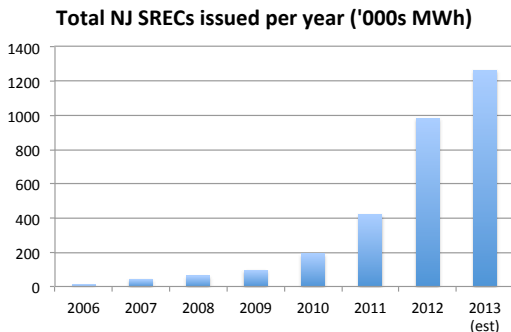
California Carbon Price History



The New Jersey SREC market

The New Jersey SREC market is the biggest in the US (among about 10 states; similar markets for 'green certificates' also exist in Europe and Asia)

- Most ambitious target of over 4% solar energy by 2028.
- Highest recorded prices so far at about \$700 per SREC.
- Rapid growth witnessed in solar installations in recent years.



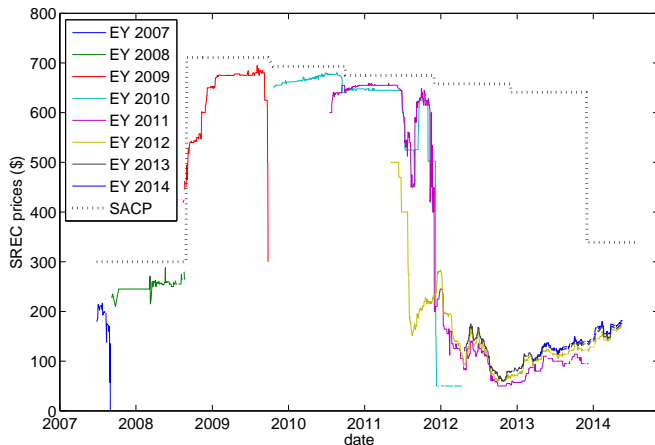
The New Jersey SREC market

The rules of the NJ market have been changed many times. Just a summary of the main ones here (penalty π , requirement R):

| Energy Year | True-up Period | Oldest Rules (no banking) | | 2008 change (3-year life) | | 2012 change (5-year life) | |
|-------------|----------------|------------------------------|-------|------------------------------|-------|------------------------------|-------|
| | | R | π | R | π | R | π |
| 2007 | 3 mon | 32,743 | 300 | | | | |
| 2008 | 3 mon | 65,384 | 300 | | | | |
| 2009 | 4 mon | 130,266 | 300 | 130,266 | 711 | | |
| 2010 | 4 mon | 195,000 | 300 | 195,000 | 693 | | |
| 2011 | 6 mon | | | 306,000 | 675 | | |
| 2012 | 6 mon | | | 442,000 | 658 | 442,000 | 658 |
| 2013 | 6 mon | | | 596,000 | 641 | 596,000 | 641 |
| 2014 | 6 mon | | | 772,000 | 625 | 1,707,931 | 339 |
| 2015 | 6 mon | | | 965,000 | 609 | 2,071,803 | 331 |
| 2016 | 6 mon | | | 115,0000 | 594 | 2,360,376 | 323 |
| 2017 | 6 mon | | | | | 2,613,580 | 315 |
| 2018 | 6 mon | | | | | 2,829,636 | 308 |

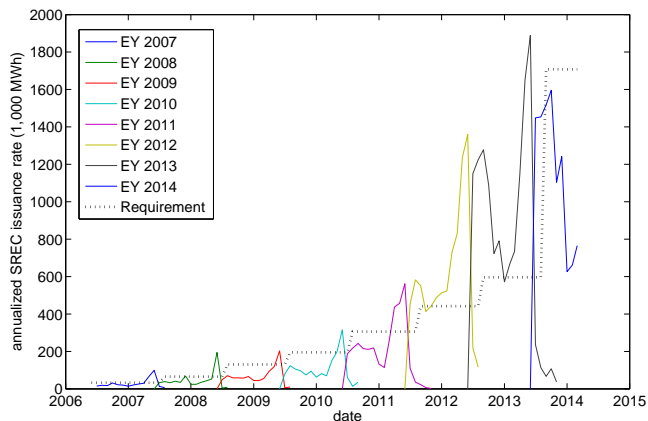
The New Jersey SREC market

What about historical prices? Very high (near penalty π) until recently...



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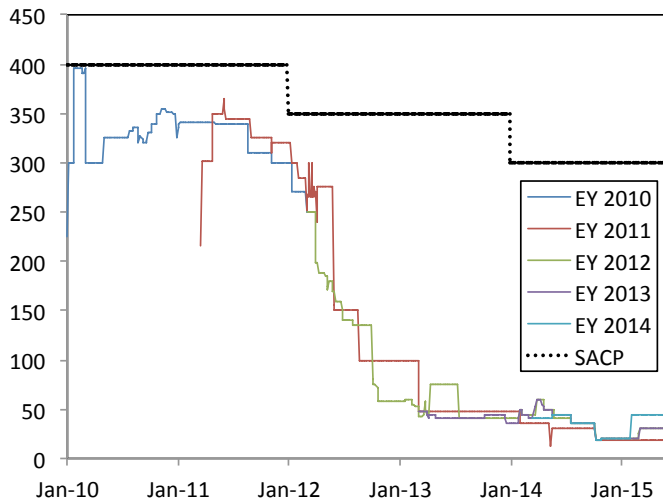
Historical (monthly) issuance data easily available online. Rapid growth in 2010-13 led to sudden swing from under to oversupply (and price collapse).



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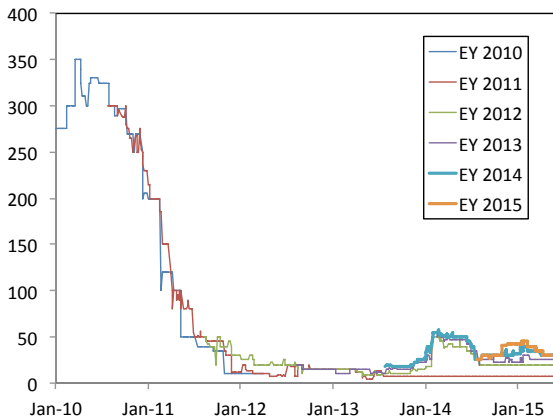
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Ohio SREC prices 2010-15:



Was this just a Jersey thing?

Pennsylvania SREC prices 2010-15:



Such sudden price swings are worrying for solar investors and regulators.

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 - *For carbon*, P_t is increasing in emissions level E_t (relative to cap $K(T)$), **but** higher P_t slows the growth of E_t .
 - *For RECs*, P_t is decreasing in generation level g_t (relative to requirement $R(T)$), **but** higher P_t encourages growth of g_t .

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As usual when matching supply and demand, an equilibrium results! :)

Carbon/REC Price Modelling - Basics

Key features for carbon:

- Financial contract, unlike other commodities $\implies e^{-rt}P_t$ martingale
- Derivative on total emissions $E_t = \int_0^t X_u du$ ('emissions rate' $X_t \geq 0$)
- In a single period, with cap K , penalty π :

$$P_t = e^{-r(T-t)} \mathbb{E}_t^{\mathbb{Q}} [\pi 1_{\{E_T > K\}}]$$

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Key features for SRECs (analogously):

- Financial contract, unlike other commodities $\implies e^{-rt}P_t$ martingale
- Derivative on total generation $b_t = \int_0^t g_u du$ ('generation rate' $g_t \geq 0$)
- In a single period, with requirement R , penalty π :

$$P_t = e^{-r(T-t)} \mathbb{E}_t^{\mathbb{Q}} [\pi 1_{\{b_T < R\}}]$$

Key Observation: X_t and g_t should be dependent on P_t (decreasing for former, increasing for latter), due to the feedback effect.

Carbon Price Modelling - One Period

Higher carbon price P_t reduces emissions X_t via two forms of abatement:

- 'Immediate' abatement in power sector due to the merit order.
- Longer-term abatement due to incentives to use clean technology, etc.

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The power stack model can give us $X_t(P_t)$ to capture the first effect. Then

$$P_t = e^{-r(T-t)} \pi \mathbb{P}_t^{\mathbb{Q}} \left\{ \int_0^T X_u(P_u) du > K \right\},$$

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How to solve?:

- Discretize and solve backwards via dynamic programming (fixed point problem at each gridpoint)
- In continuous time, drift of E_t dependent on P_t (and other factors):

$$dE_t = \mu_e(P_t, C_t, G_t, D_t)dt \quad (\text{possibly } + \sigma_e dW_t)$$

FBSDE is needed (Carmona *et al.* (2012), Howison/Schwarz (2012))

Carbon Price Modelling - FBSDE

Combining the processes for demand, fuels (using $\mathbf{S}_t = (C_t, G_t)$), cumulative emissions and allowance price leads to the FBSDE below:

$$\left\{ \begin{array}{ll} dD_t = \mu_d(t, D_t)dt + \sigma_d(D_t)d\tilde{W}_t^0, & D_0 = d_0 \in (0, \bar{\xi}), \\ d\mathbf{S}_t = \mu_s(\mathbf{S}_t)dt + \sigma_s(\mathbf{S}_t)d\tilde{\mathbf{W}}_t, & S_0 = s_0 \in \mathbb{R}_{++}, \\ dE_t = \mu_e(D_t, P_t, \mathbf{S}_t)dt, & E_0 = 0, \\ dP_t = rP_tdt + Z_t^0d\tilde{W}_t^0 + Z_t \cdot d\tilde{\mathbf{W}}_t, & P_T = \pi 1_{\{E_T > K\}}. \end{array} \right.$$

- (D_t, \mathbf{S}_t, E_t) - forward part
- (P_t) - backward part,
- (Z_t) - generator

We solve for $P_t = f(t, D_t, E_t, \mathbf{S}_t)$ numerically via the corresponding non-linear PDE. Can then (e.g. Carmona Coulon Schwartz 2012):

- price derivatives (eg, spread options) by simulation (or via a 2nd PDE).
- compare impact of cap-and-trade with a carbon tax (fixed P_t).

Summary Comparison: Carbon vs RECs

Clearly many similarities with cap-and-trade, but also key differences:

| Feature | Cap-and-trade | NJ SREC market |
|------------------|--------------------------------|---|
| Banking | (typically) unrestricted | finite # of times (eg. 4) |
| Borrowing | within trading periods | none |
| 'Withdrawal' | Penalty plus debt | Penalty (SACP) only |
| Periodicities | none significant | solar generation seasonal |
| Feedback | power sector fuel switching | new construction of solar generation |
| Available data? | challenging at EU level | easy (at monthly freq) |
| Correlated with? | power, gas, coal, etc | relatively separate <i>for now!</i> |

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However, many other rule variations. For example, in Scandinavia:

- Unlimited banking (until market ends in 2035)
- **But**, no new supply allowed after 2020! (a 'creative' design)
- **And**, penalty resets to 1.5 times previous year's price! ('interesting')

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$$p_t^y = \max_{v \in \{\lceil t \rceil, \lceil t \rceil + 1, \dots, y + \tau\}} e^{-r(v-t)} \pi_t^v \mathbb{E}_t [1_{\{b_v=0\}}]$$

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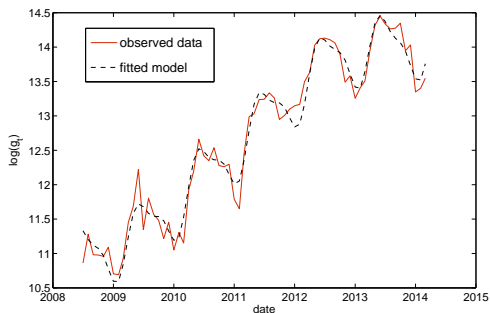
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Note: Extending to multi-period in carbon similar but 'withdrawal' rule
 \implies price is a sum, not a max! (e.g., Hitzemann Uhrig-Homburg 2014)

NJ SREC issuance data

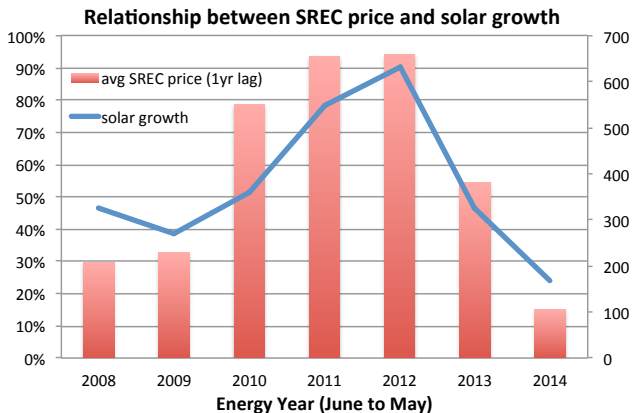
Lastly, a stochastic model for solar generation rate g_t . Log of monthly SREC issuance shows some noise, seasonality and a clear upwards trend:



Like for electricity demand, perhaps model g_t with an OU process plus a trend and cosines? Anything missing? (notice recent flattening)

NJ SREC issuance data

Looking more closely at SREC generation growth (and in recent data):



Clear relationship between growth rate and (1yr lagged) price!

Structural model for SREC prices

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- We then assume that the average annual generation rate \hat{g}_t grows as:

$$\frac{d}{dt}(\ln(\hat{g}_t)) = a_5 + a_6 \bar{p}_t, \quad \text{for } a_5 \in \mathbb{R}, a_6 > 0$$

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- \bar{p}_t allows for dependence on *historical* prices, e.g. a lagged EWMA:

$$\bar{p}_t^y = \delta p_{t-\gamma}^y + (1 - \delta) \bar{p}_{t-\Delta t}^y \quad (\text{where } \bar{p}_{t_0}^y = p_{t_0-\gamma}^y).$$

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This completes the model. We now solve by dynamic programming.

(Between years $p_t^y = e^{-r\Delta t} \mathbb{E}_t^{\mathbb{Q}}[p_{t+\Delta t}^y]$, while jumps can occur at $t \in \mathbb{N}$.)

Summary of the Algorithm

Recall: Firstly the price today as a maximum over expected payoffs:

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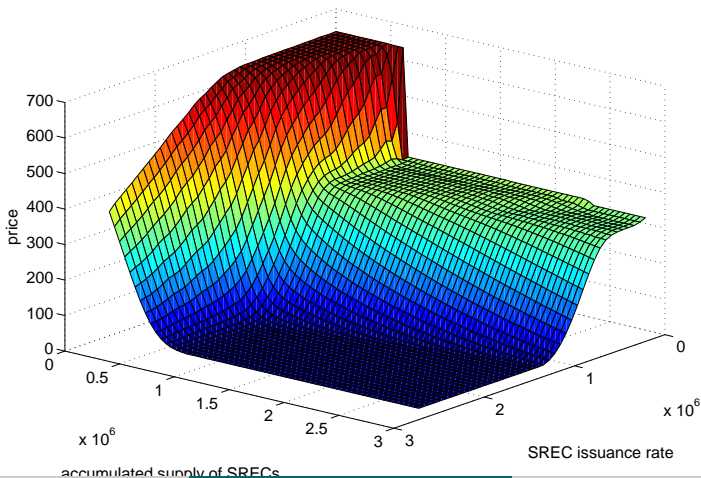
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Notes:

- Expected price drops at compliance dates (breaking martingale condition) but this captures when all certificates should be used up.
- BSDE to PDE approach can also be applied here, with (trivial) 'exercise' condition each compliance date (like a Bermudan option).

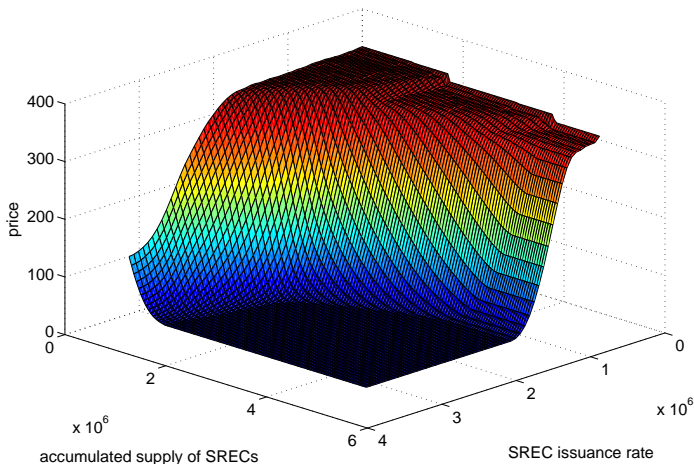
Results of structural model

Solving algorithm produces a surface $P_t(b_t, \hat{g}_t)$ for each time.
For 2013 SRECs near the end of the first year:



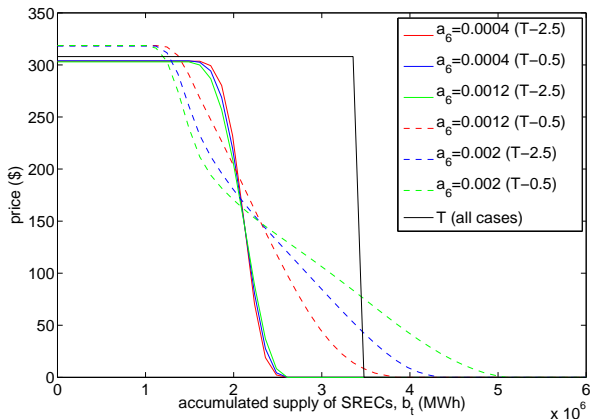
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Same price surface but six months later:



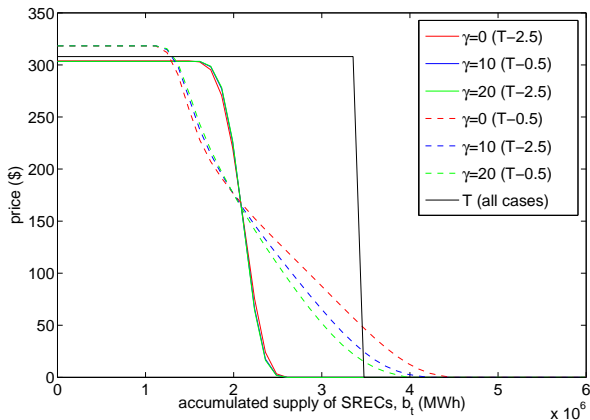
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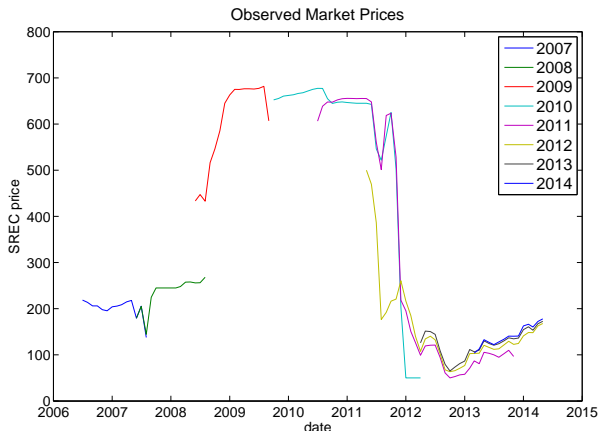
Sensitivity to feedback lag parameter γ :



Comparison to history

After fitting parameters, we compare historical market vs model prices:

- Overall price behaviour through history reasonably encouraging
- Also, provides further evidence about nature of feedback in market



Comparison to history

Feedback parameter found to be $a_6 = 1.3 \times 10^{-3}$. With lag $\gamma = 5/12$:



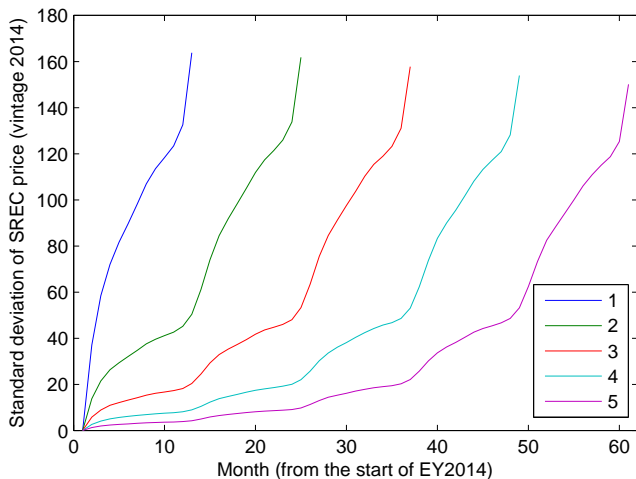
Comparison to history

With larger time lag $\gamma = 10/12$, recent price drop is more dramatic:



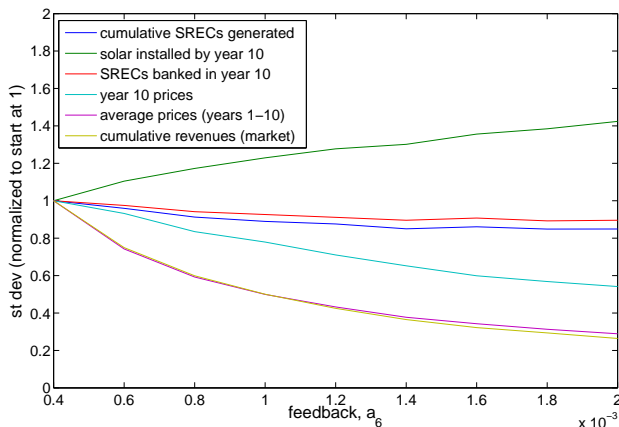
Impact of Banking

A larger number of banking years clearly produces greater price stability:



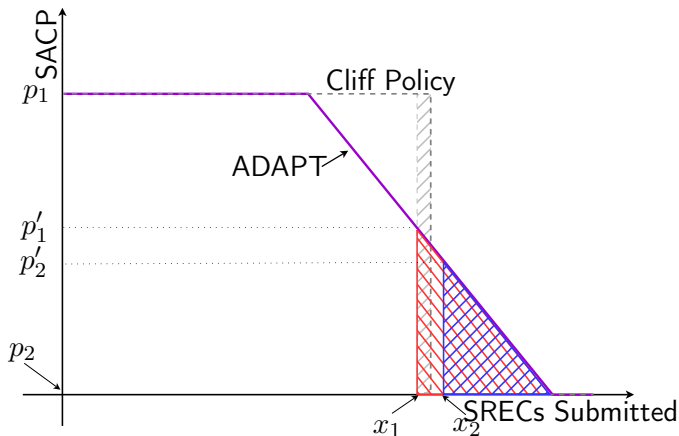
Impact of Feedback

An increase in feedback a_6 also stabilizes prices. However, can come at the expense of quantity uncertainty (top line in plot below):



Policy Analysis - Other Ideas?

Inherent instability (in both REC and carbon markets) is due to the digital payoff functions... why not try something smoother? (eg, slope below)



(Example prices for submitted SRECs x_1 and x_2 . Shaded triangles = penalty paid.)

Penalty Function: Step vs Slope

A sloped penalty function implies:

- A non-trivial (model-dependent) banking decision each year
- A resulting threshold analogous to Am. options' 'exercise boundary'

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Price of SRECs of vintage y at time t now calculated via

$$p_{t,y} = \max \left(f_t(x_t), e^{-r\Delta t} \mathbb{E}_t[p_{t+\Delta t}^y] \right),$$

for $t \leq y + \tau$ (i.e. before expiry) where for $t \in \mathbb{N}$,

$$f_t(x_t) = \max \left(0, \min \left(\pi_t, \left(\pi_t - \frac{\pi_t}{2\lambda R_t} (x_t - (1 - \lambda)R_t) \right) \right) \right)$$

Here x_t is the optimal number of SRECs submitted at t . But optimal how?

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$$V_t = \min_{x_t} \mathbb{E}_t \sum_u e^{-r(u-t)} \int_{x_t}^{(1+\lambda)R_u} f_u(x') dx',$$

(Can write x_t as the solution of an overall cost minimization problem)

Penalty Function: Step vs Slope

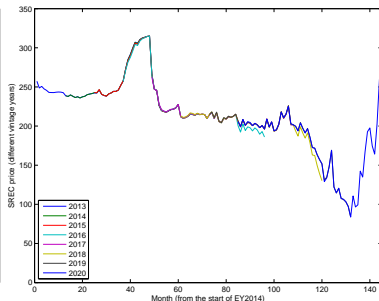
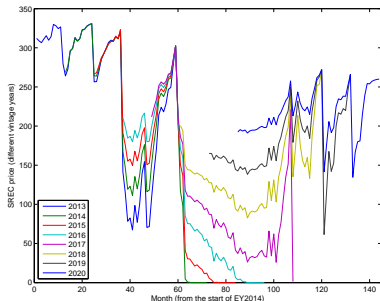
Simulations of different vintages reveal that with a sloped penalty:

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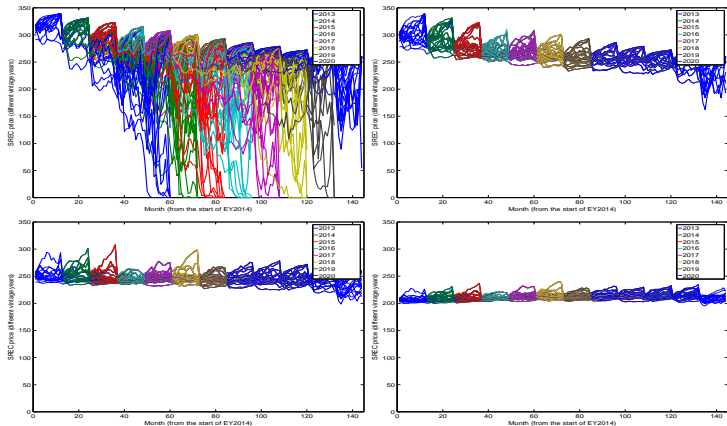
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Simulations above use the same set of random numbers but for the step case ($\Delta = 0$) on the left and slope case ($\Delta = 500$ GWh) on the right.

Penalty Function: Varying Slopes

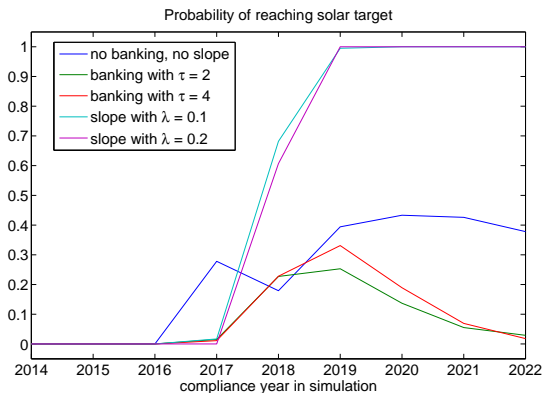
20 simulations of 8yrs, with increasing values of λ (flattening slope):



Similar vol decrease achievable via longer banking, but some tradeoffs...

Extra Banking vs Sloped Penalty

Using the approx current NJ conditions (huge oversupply, but high R), we simulate the probability of reaching targets on **installed** solar: $\mathbb{P}\{\hat{g}_t > R_t\}$



Increased banking can lead to years of being stuck in oversupply!

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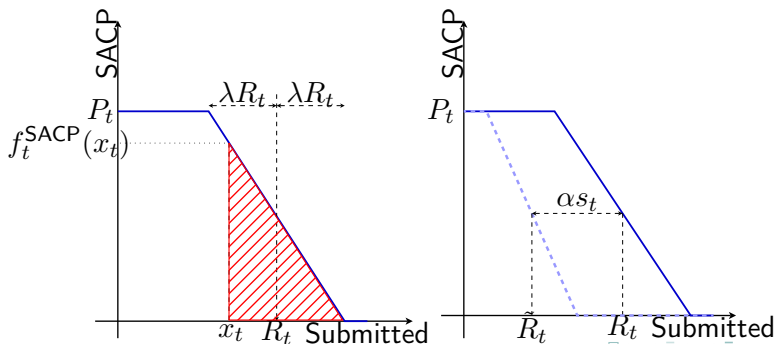
- Finally, in addition to this formula for R , Mass implements a \$300 fixed-price auction each year, as a form of 'price floor mechanism'.

ADAPT policy proposal

We hence suggest an approach called 'ADAPT' (Adjustable Dynamic Assignment of Penalties and Targets) which provides regulators with two parameters (λ, α) as tools to control price volatility in the market.

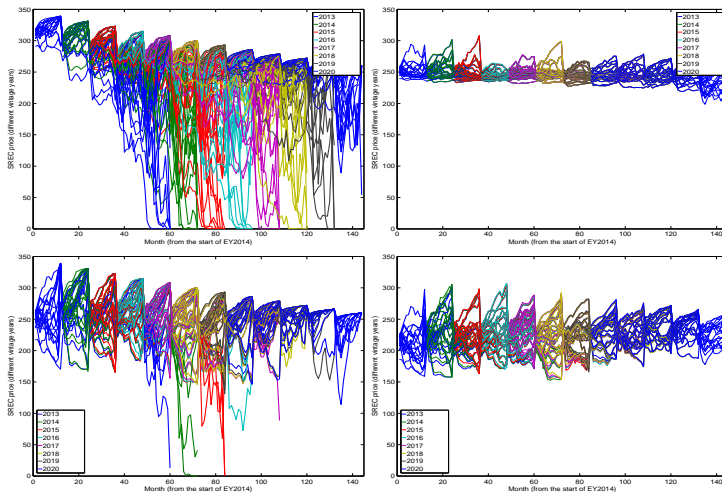
- λ controlling the slope of the penalty function.
- α for controlling the responsiveness of the requirement.

Ultimately different hybrid schemes between fixed price and fixed quantity!



ADAPT policy: Varying λ and α

20 simulations, with (λ, α) given by $(0, 0)$, $(0.3, 0)$, $(0, 0.5)$, and $(0.3, 0.5)$:



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Many market design options to stabilize prices (encourage investment):

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climate equity/fairness!

Global Carbon Market Design

Lima COP20 climate change conference in Dec 2014 led to typical frustration and obstacles, but also some important progress:

- Abandoning of the traditional Annex I - non-Annex I split of nations
- Instead, 'Common but differentiated rights and respective capabilities'
- Nationally determined targets (INDCs) due to be submitted, but effective no means to link these to global temperature targets.

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Hence, crucial to determine how to distribute emissions reductions among countries. Literature considers many concepts, sometimes hard to quantify:

- *Responsibility* - polluter pays for historical responsibilities
- *Equity* - equal long-term per capita emissions rights
- *Sovereignty* - a status quo rights based on current emissions
- *Capability* - more developed / richer countries can do more

Various proposals exist, but new ideas needed on how to identify exempt countries, allocate global reduction duties among others and through time.

A dynamic formula for determining emissions reductions

For country $j = 1, \dots, N$, we propose a Minimum Reduction Commitment (MRC) for period $t + 1$ set dynamically as a function of population $P_{j,t}$ and emissions $E_{j,t}$ via

$$MRC_{j,t+1} = \underbrace{(C_{t+1} + V_t)}_{\text{total reductions}} \underbrace{\frac{(PC_{j,t} - PCW_t)P_{j,t}}{\sum_{i:PC_{i,t}>PCW_t} (PC_{i,t} - PCW_t)P_{i,t}}}_{\text{split among parties}}, \quad \underbrace{\text{if } PC_{j,t} > PCW_t}_{\text{reduction criterion}} \quad (1)$$

where $PC_{j,t} = E_{j,t}/P_{j,t}$, $PCW_t = \sum_{i=1}^N E_{i,t} / \sum_{i=1}^N P_{i,t}$, and C_{t+1} is a predetermined common target, and V_t a dynamic 'variations' term:

$$V_t = \max \left(0, \sum_{i:PC_{i,t-1} < PCW_{t-1}} (E_{i,t} - E_{i,t-1}) \right)$$

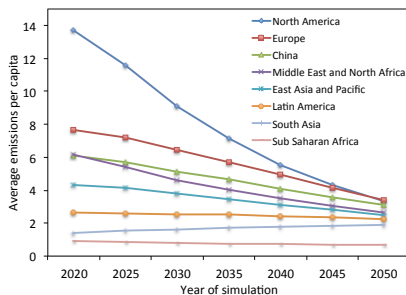
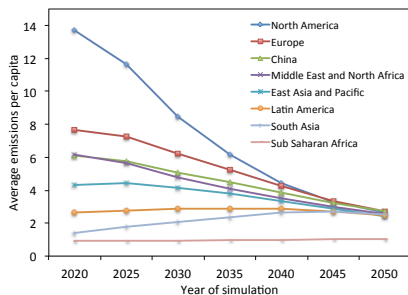
thus allowing countries below average to increase emissions.

Simulation Results from the Dynamic Mechanism

We use UN and World Bank data and the following:

- BAU is simple emissions projections and volatility estimates by country.
- Countries with MRCs assumed to reach these on average, while those below the average grow at scaled versions of business as usual (BAU):

Fast (50-100% of BAU) and slow (0-50% of BAU) growth cases:

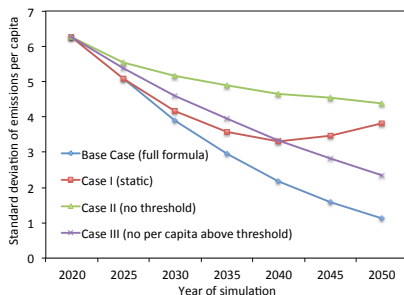
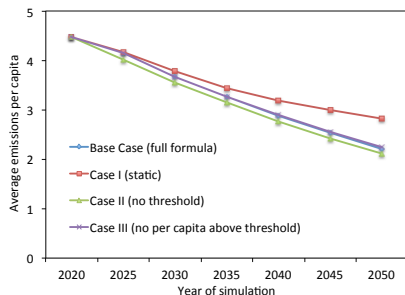


Simulation Results from the Dynamic Mechanism

We then the full formula modified versions, removing its key features

- (I) *Static* - equation (1) sets MRCs in advance, by assuming no noise;
- (II) *No Threshold* - all countries receive MRCs every period, shifting threshold in equation (1) from PCW_t to zero;
- (III) *No Per Capita Differentiation above Threshold* - same threshold, but countries above all receive equal % emissions reduction targets.

Global per capita emission projections (left) and standard devs (right):



Conclusions

Many interesting questions for further research, much work to be done!

- Market design: what should regulator objectives be and how best to achieve these with various regulatory tools?
- Political risk: how do market participants respond to regulatory uncertainty / intervention?
- Optimal investment: how does feedback really work? when should generators build more renewables?
- Lagged effects: how do time lags in feedback change optimal behaviour?
- Global carbon: optimal behaviour of countries once market exists? abating vs buying credits? impact of threshold? game theory?