

# Trading Beyond Compliance: An Analysis of Electricity Firm Participation in the European Union Emissions Trading Scheme

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# Background

- \* Firm participation in an emissions trading scheme (ETS) is not limited to **compliance trading**
- \* Theoretically firms with **dual goods and permit market power** have incentives to hold a **sub-optimal excess** of permits in certain conditions
  - \* Free Allocation
  - \* Low Abatement Target
  - \* Shown in a static framework by Hintermann (2011), Calford, Heinzel and Betz (2010) and Eshel (2005)



# How Dominant Firms Profit from Excess Holdings : Static Model

Competitive Fringe  $i = 2 \text{ to } N$

$$\max_{q, e, x} \prod_i = \underline{pq_i} - C^i(q_i, e_i) - \underline{\sigma(x_i - \bar{x}_i)}$$

$$s.t. e_i \leq x_i + \bar{x}_i$$

$$\frac{\partial \Pi}{\partial q_i} \rightarrow p = \frac{\partial C^i}{\partial q_i}, \frac{\partial \Pi}{\partial e_i} \rightarrow \sigma = \frac{\partial C^i}{\partial e_i}$$

Familiar FOC results MCP = P, MCA = permit price

$\sigma$ : Permit Price

$x_i$ : firm i's permit purchases

$\bar{x}_i$ : firm i's permit allocation

$e_i$ : firm i's emissions

$p$ : goods market price

$q_i$ : quantity produced by i

Dominant Firm  $i=1$

$$\max_{q, e, x} \prod_1 = \underline{p(q_1, x_1)q_1} - C^1(q_1, e_1) - \underline{(x_1 - \bar{x}_1)\sigma(q_1, x_1)} + \lambda(x_1 - e_1)$$

$$s.t. e_i \leq x_i + \bar{x}_i$$

$$\frac{\partial \Pi}{\partial e_i} \rightarrow -\frac{\partial C^i}{\partial e_i} = \sigma(q_1, x_1) + (x_1 - \bar{x}_1) \frac{\partial \sigma}{\partial x_1} - \frac{\partial p}{\partial x_1} q_1$$

$$\bar{x}_1^* = x_1 - \frac{\partial p / \partial x_1}{\partial \sigma / \partial x_1} \cdot q_1$$

Optimal Allocation for Firm 1 to achieve socially optimal permit price – **Less than permit demand**



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# What happens when we allow for Intertemporal trading and banking

Firms maximise vector of present values of profits:

$$\mathbf{p} \cdot \mathbf{q}_i - C(\mathbf{q}_i, \mathbf{e}_i) - \boldsymbol{\sigma} \cdot \mathbf{x}_i$$

$$\max_{\mathbf{x}_i, \mathbf{X}_{i,t}, \mathbf{e}_i} \prod_i^p (\mathbf{x}_i, \mathbf{e}_i) - \boldsymbol{\sigma} \cdot \mathbf{x}_i$$

Kuhn-Tucker conditions:

$$1) \frac{\partial \Pi_i^p}{\partial e_{it}} - \lambda_{it} = 0$$

$$2) \lambda_{i,t+1} - \lambda_{it} + \mu_{it} = 0$$

$$3) \frac{\partial \Pi_i^p}{\partial x_{it}} - \sigma_t + \lambda_{it} = 0$$

$$4) \mu_{it} X_{i,t+1} = 0$$

$$X_{i,t+1} \geq 0, \mu_{it} \geq 0$$

$$1) + 3) \rightarrow \frac{\partial \Pi_i^p}{\partial e_{it}} + \frac{\partial \Pi_i^p}{\partial x_{it}} = \sigma_t$$

Dominant firm sets Permit price > MAC as second term > 0

$$4) \rightarrow \mu_{it} X_{i,t+1} = 0$$

$$2) \rightarrow \lambda_{i,t+1} - \lambda_{it} - \mu_{it} = 0$$

$$3) \rightarrow \therefore \sigma_{i,t+1} = \lambda_{i,t+1} = \sigma_{it} = \lambda_{it}$$

Competitive fringe firms **will not bank permits** when faced with non-increasing permit price

$$3) \& 2) \rightarrow \mu_{it} = \sigma_t - \sigma_{t+1} + \frac{\partial \Pi_i^p}{\partial x_{i,t+1}} - \frac{\partial \Pi_i^p}{\partial x_{it}}$$

Dominant firms will **bank proportionally more permits** than an equivalent non-dominant firm given a declining permit price

# Theoretical Results

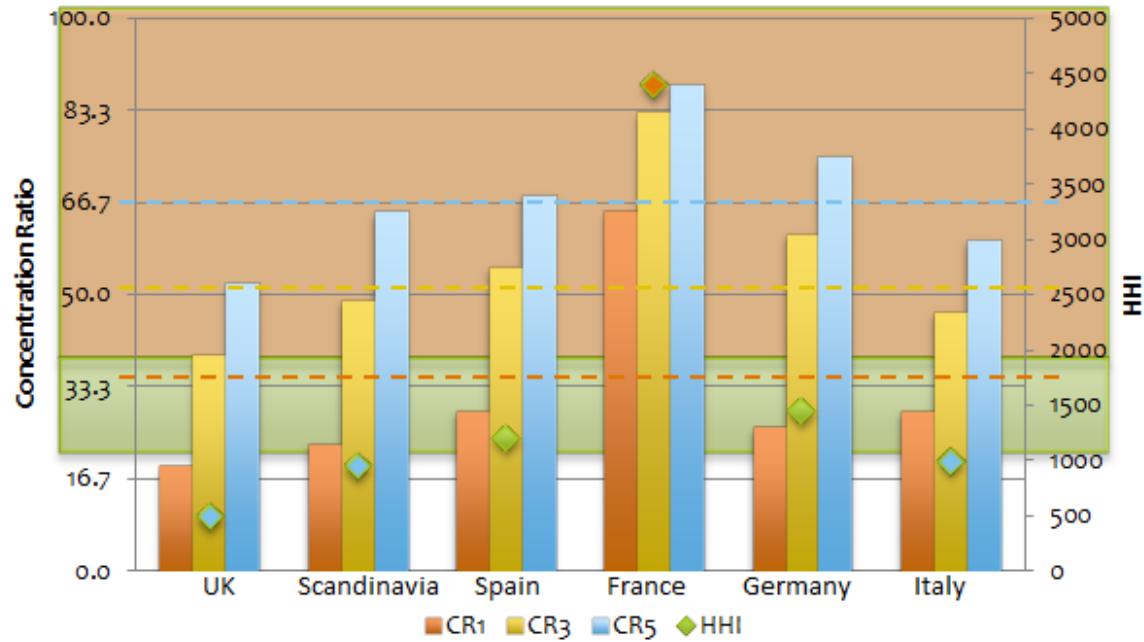
- \* Only dominant firms have an incentive to bank permits between periods with a declining permit price
- \* This behaviour drives up the prevailing price of carbon permits
- \* This increases the marginal cost of production for all electricity firms (even though permits are freely allocated as holding costly permits represents an opportunity cost)
- \* Specifically we should expect an increase in both the goods and permit market prices
- \* We should also be able to observe **systematic differences in the banking and holding levels** between dominant and competitive-fringe firms



# Market Power in the Electricity Market

## Goods Market Dominance

- Concentration ratios and HHI
- Largest firms in concentrated zones
- Moderate: Spain and Germany
- High: France



## Other Factors?

- Ownership structure, would a government owned firm hold excess permits to profit?



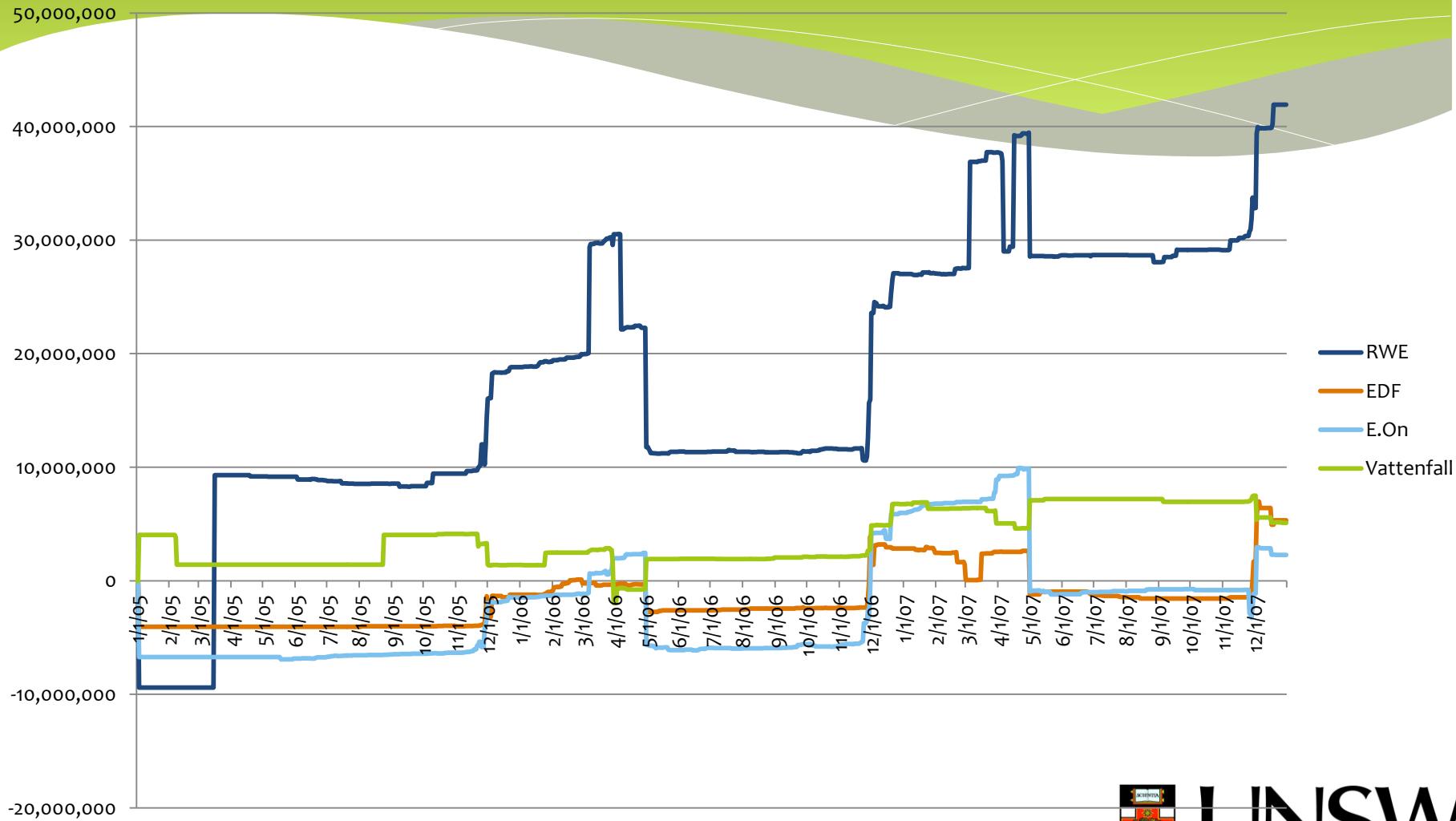
# Market Power in the Permit Market

## (Phase I – First Year)

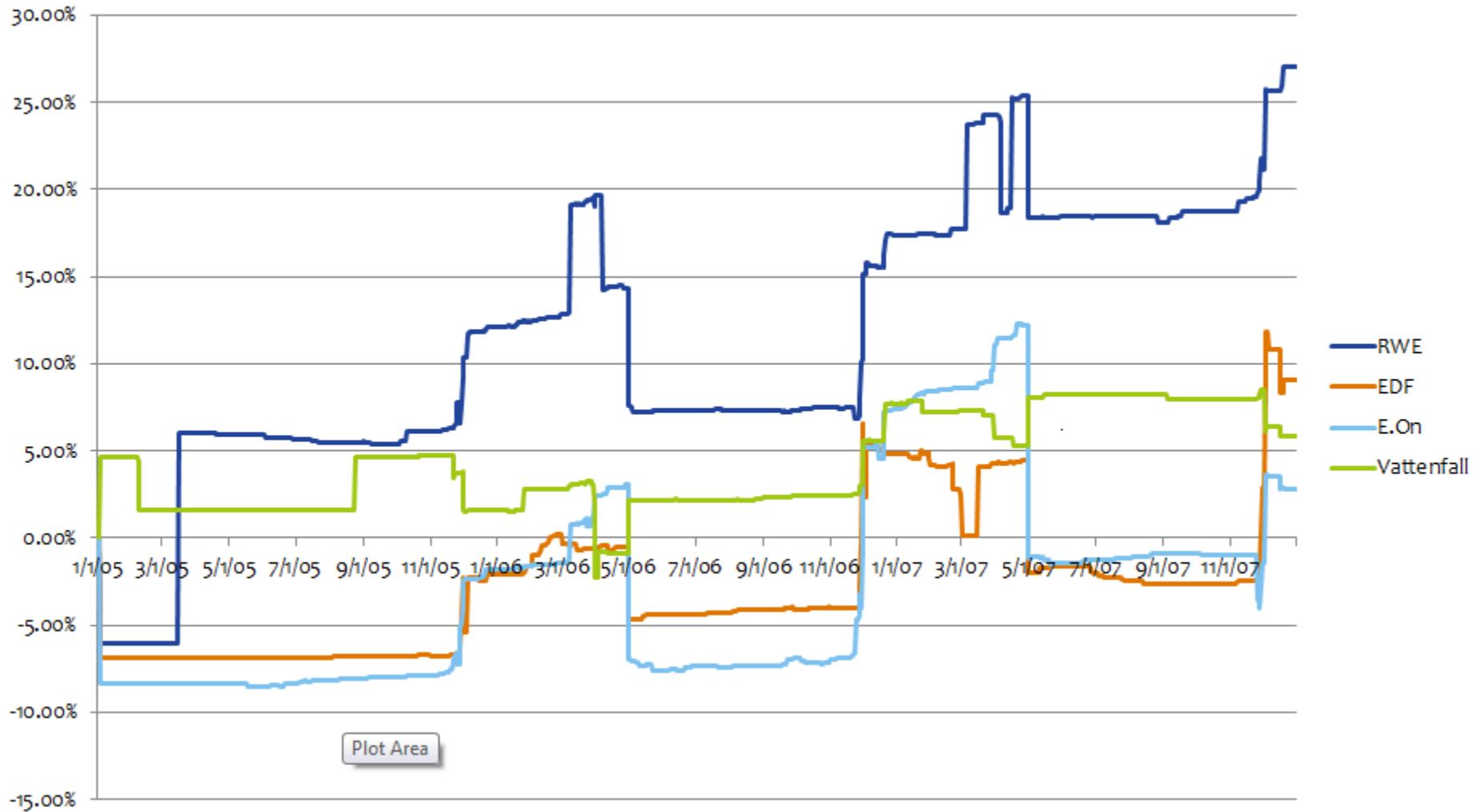
Rank	Firm	Permits Allocated	Total Share	Verified Emissions	Allocation Surplus / Deficit
1	RWE	145,811,862	6.96%	155,229,304	-9,417,442
2	Vattenfall	91,689,393	4.37%	87,645,985	4,043,408
3	E.ON	73,865,224	3.52%	80,578,342	-6,713,118
4	PGE Polska Grupa Energetyczna	59,754,900	2.85%	58,143,546	1,611,354
5	Enel	58,329,870	2.78%	68,042,124	-9,712,254
6	EDF	54,989,146	2.62%	59,033,243	-4,044,097
7	DEI	52,095,606	2.49%	52,587,962	-492,356
8	GDF SUEZ	48,344,189	2.31%	55,486,479	-7,142,290
9	CEZ	42,243,211	2.02%	37,494,570	4,748,641
10	Endesa	40,433,894	1.93%	49,352,656	-8,918,762



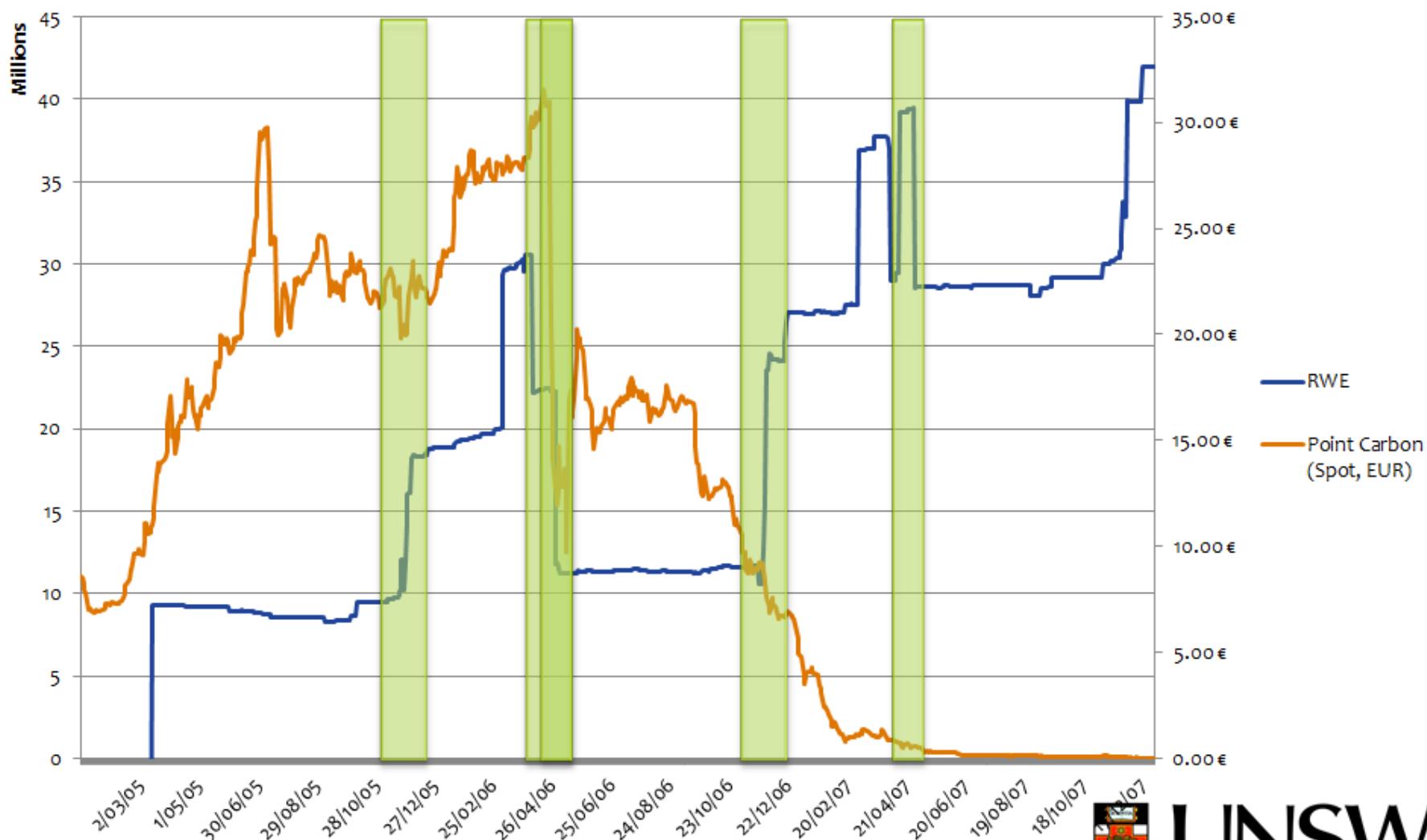
# Permit Holdings Above Compliance : 4 Largest Electricity Firms



# Permit Holdings Above Compliance Relative to Verified Emissions : 4 Largest Electricity Firms



# RWE Holdings vs EUA Spot Price



# Policy Implications

- \* Allocation plans must not only consider cap, but **also distribution to firms** – not previously thought to impact efficiency
- \* High allocation to electricity firms is supposed to negate output price rises, when in fact it may exacerbate the problem
- \* Full auction? – transfer of wealth from electricity generators to government



# Future Work

- \* Empirical Testing
  - \* Develop a good measure of market power that can be used to test dominant firms compliance levels
  - \* Assess the relation between price movement and holdings for dominant firms
    - \* Test for example if RWE holding can explain EUA price variation
  - \* Examine the pass though rates in different markets

