

EU Emission Trading - Better Job Second Time Around?

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Overview of EU ETS

- Cap-and-trade type scheme ...
- Operates in stages:
phase 1 (2005-07), phase 2 (2008-12) etc.
- Banking between phase 1 and phase 2 not possible but from 2008 unlimited
- Links to project credits established
- Allocation rules given by EU Directive:
 - up to 95% for free 2005-07 and 90% in 2008-2012, rest to be auctioned
- National Allocation Plans for each phase:
 - Define ET-budget (Macro) and rules on installation level (Micro)
 - To be approved by EU Commission



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EUA spot prices and volumes traded in the EU ETS



Source: EEX (download 11 May 2007)

Phase 1: Likely excess allocation; little incentives to save emissions and energy

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EUAs allocation exceeded 2005 emissions by around 100 Mio. t CO₂

Source: Point Carbon

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Outline

Macro Analysis

planned and approved NAPs for phase 2

- Assess stringency of ET budgets
- Assess economic efficiency of the split between covered and non-covered sectors

Micro Analysis

- Assess economic efficiency: compare allocation rules for existing and new installations with "ideal" rules

Conclusions



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Assess stringency of ET budgets

	ET-budget in phase 2 compared to						KM limit for companies in million ERU-CER/a
	VET 2005 (criterion 1)		ET-budget in phase 1 (criterion 2)		Emission projections for 2010 (criterion 3)		
	in million EUA	in % of VET 2005	in million EUA	in % of ET- budget phase 1	in million EUA	in % of projected emissions	
EU-15 (15) Notified	-149.1	-9.6%	-111.5	-6.7%	-119.7	-7.2%	286.4
(10) Accepted	-176.6	-15.0%	-152.9	-12.3%	-150.8	-12.1%	163.3
EU-10 (10) Notified	127.9	25.8%	65.8	12.7%	67.9	13.1%	86.7
(5) Accepted	1.8	3.6%	-7.0	-13.2%	-20.4	-38.1%	4.1
Total (25) Notified	-21.2	-1.0%	-45.7	-2.1%	-51.8	-2.4%	373.1
(15) Accepted	-174.8	-14.2%	-160.0	-12.3%	-171.1	-13.2%	167.4

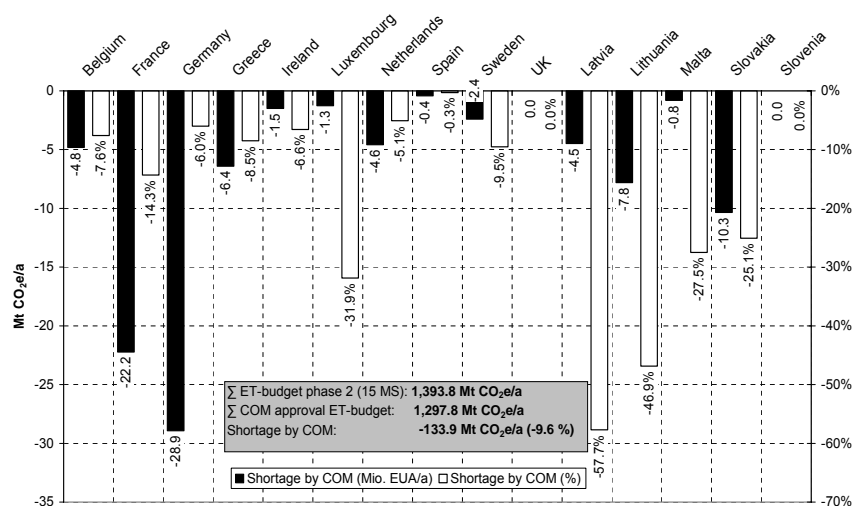
- ET-budgets in notified NAPs imply little efforts (because very generous EU10 budgets)
- ET-budget in NAPs accepted by EU Commission are significantly more ambitious
- If maximum of Kyoto Mechanism is used, no need for internal reductions, gap could be closed by KM



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Budget cuts required by European Commission



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EUA futures (2008) prices and volumes traded in the EU ETS



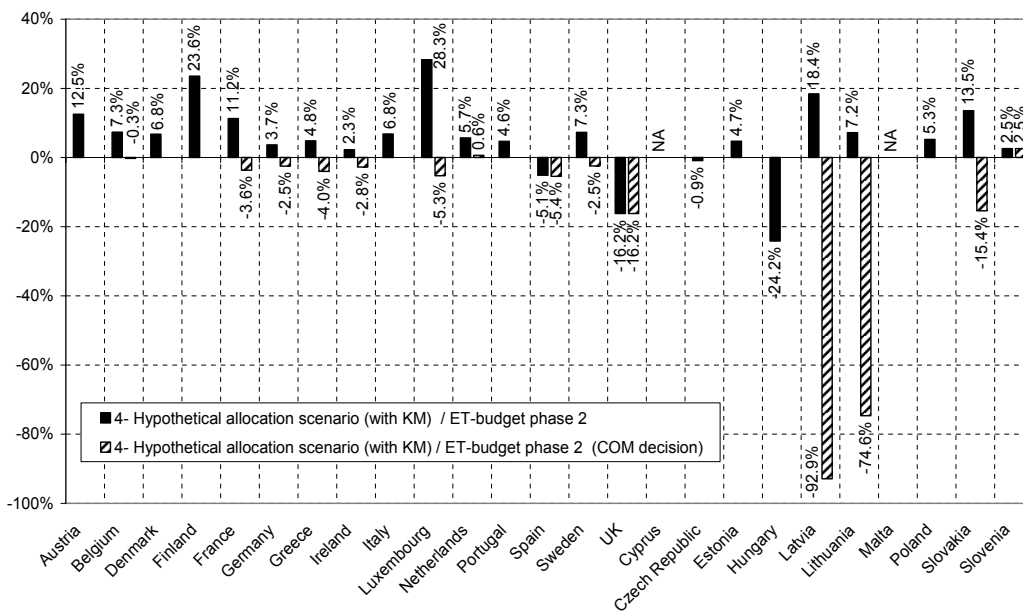
Source: EEX (download 11 May 2007)

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Source: Point Carbon

Are emission budgets economically



Notified NAPs imply inefficient split of reduction burden between covered and non-covered sectors

Accepts NAPs situation improved for most countries

Micro level allocation (selected issues)

Existing installations

- Ideal: full auctioning (polluter pays)
- Second best: benchmarks (early action recognized; incentives for replacements)
- Actual: grandfathering based on historic emissions still dominating

New installations

- Ideal: purchase all allowances
- Second best: uniform benchmarks
- Actual: fuel/technology-specific benchmarks (BAT)



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Conclusions

Environmental effectiveness

- + Substantially improved by EC decision, higher prices for EUAs; improved incentives to invest in energy efficiency; signal to other MS and carbon markets ("EC is serious about climate change and about ET")

Economic efficiency

- + Improved by EC decision at macro level
- auction share (x%) lower than allowed (10%); must increase in future (MIN rather than MAX)
- + increase in benchmarking (primarily in energy sector) as "second best"
- free allocation to new projects (= technology specific subsidies"); fix closure rules

Comparison to phase 1

- path dependency of methods and concepts
- "improvements" are small (auctioning, use of benchmarks, standardized load factors, less special provisions in old MS, but additional in new MS, transparency)
- increased harmonization does not always lead to increased efficiency



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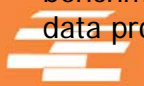
Reality: Allocation Method for Existing Installations

Allocation method

- conventional grandfathering (based on historic emission levels) remains dominating method
- increase in (average) benchmarking for "sufficiently homogenous product groups" (power sector) – often differentiated by fuels (distributional issues!)
- several MS use installation-level verified emission data 2005
- auction share of 1.3 % in phase 2 (maximum share allowed by Directive: 10 %)

Assessment

- updating leads to biased decisions on output and emissions
- Low auction share
- benchmarking may be second best ("fair", incentives to modernize, but data problems and distributional implications; sunk cost)



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Theory: Micro-Level Allocation

Allocation method: 100% Auctioning

- "polluter pays principle" applies, "fair" outcome
- addresses windfall profits, no "closure problem"
- transparent, easy, no rent seeking
- auction revenue: double dividend, compensation

New projects: buy all allowances at market prices

- otherwise: investment decision does not consider social marginal costs
- output subsidy
- inefficient outcome

Closure of installation: keep allocation

- otherwise: firms may postpone closure of old plants
- output subsidy
- inefficient outcome



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Reality: New Projects

Allocation rule

- all MS: free, from new entrant reserve; (except: SWE: power plants)
- most MS: first-come-first served; some MS: reserve replenishment rule;

Allocation base

- most MS: specific emissions ; projected activity
- many MS: BAT-benchmarks, projected activity (standardized utilization rates; capacity), typically for power sector
- most MS (power sector): allocation is differentiated by fuels, technologies, load factors (exceptions include UK, Lux)

Assessment

- poor economic incentives for innovation
- rules tend to subsidize and manifest existing production structures
- no even level playing field, prisoners' dilemma (?)



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Perspectives

Future of EU ETS

- EU-wide emission target rather than targets for MS (?)
- independent "central bank" responsible for allocation; would avoid "abuse" of allocation to address issues of distribution and competition
- longer trading periods (10 year rule?) to improve certainty for investments and mitigate incentives from "inefficient" closure rules
- include other sectors and gases (aviation, N₂O)

Exporting EU ETS

- to other countries (CH ?)
- linking with existing or new ETS, e.g. in US (RGGI)



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Reality: Closures

Closure rule

- all (?) MS: distribution of EUAs terminated in year of closure
- few MS: transfer rule for plant replacements to increase incentives for modernization (strings attached)

Assessment

- Problem is two fold:
 - 1) ET Directive links allocation to GHG permit for installation; MS link GHG permit to operation permit; if operation permit expires, GHG permit expires, and allocation has to stop
 - 2) Fear of exporting plants *and* allowances



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