Allowance Supply & Demand: Implications for Cap & Trade Through 2030

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Remarks draw upon

"Expecting the Unexpected: Emissions Uncertainty and Environmental Market Design", Severin Borenstein, James Bushnell, Frank Wolak, and Matthew Zaragoza-Watkins and

"(Overly) Great Expectations: Disillusion with Cap-and-Trade in California" James Bushnell and "California's Cap-and-Trade Market Through 2030: A Preliminary Supply/Demand Analysis" Severin Borenstein, James Bushnell, and Frank Wolak

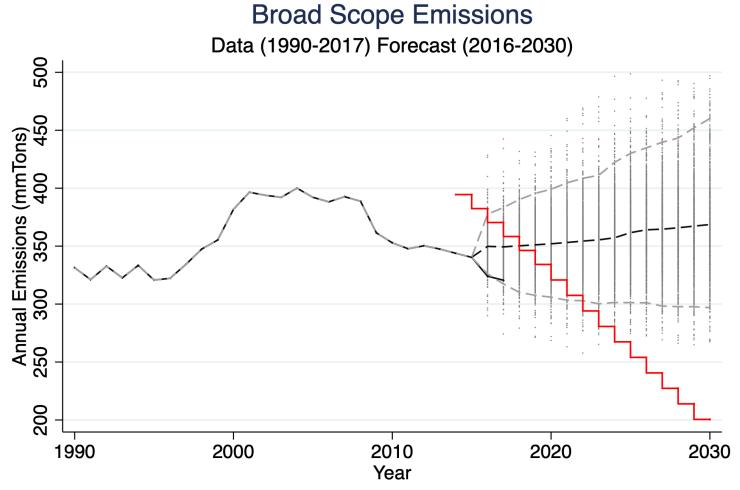


Framing the "Overallocation" Issue

- Capped emissions through 2017 have been increasingly below caps set for those years
 - Some allowances have been unsold, others unused (or "banked")
- The system post-2021 introduces a hard cap and two price "Steps" along with a rising floor
 - Analogous to a progressive carbon tax where tax rates rise with higher levels of emissions
- Should we be focused on (just) 2030 emissions? Cumulative emissions through 2030? or expected carbon price?



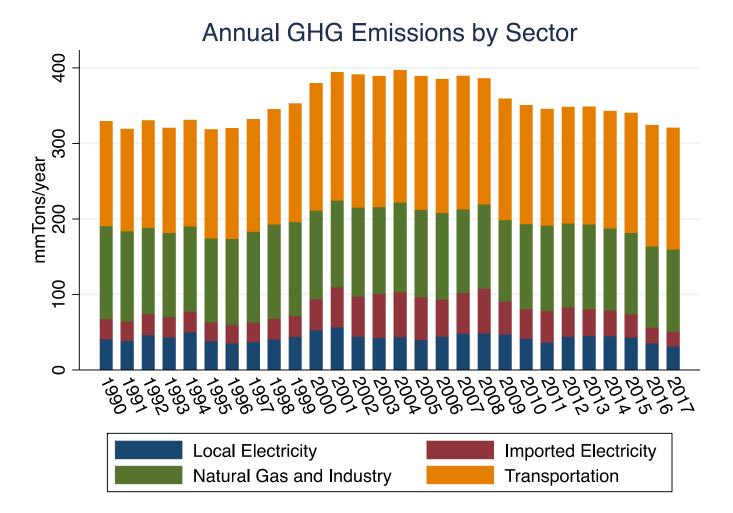
BAU Forecast Updated through 2017



Solid line shows actual values; Stairstep line shows annual broad scope cap level

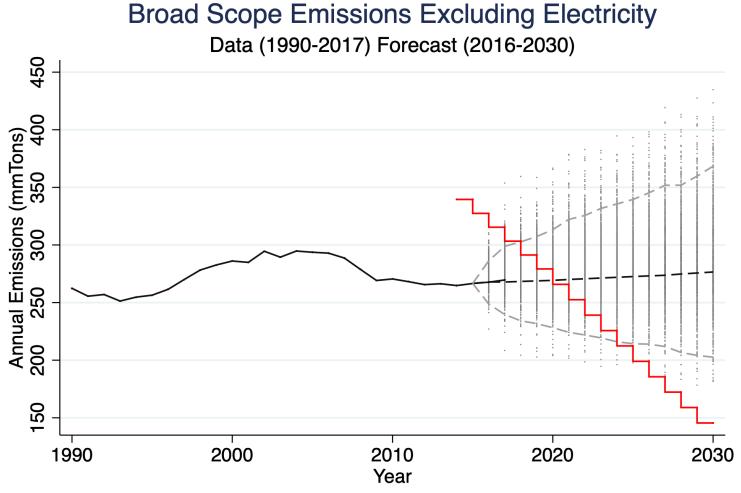


Reductions Dominated by Electricity





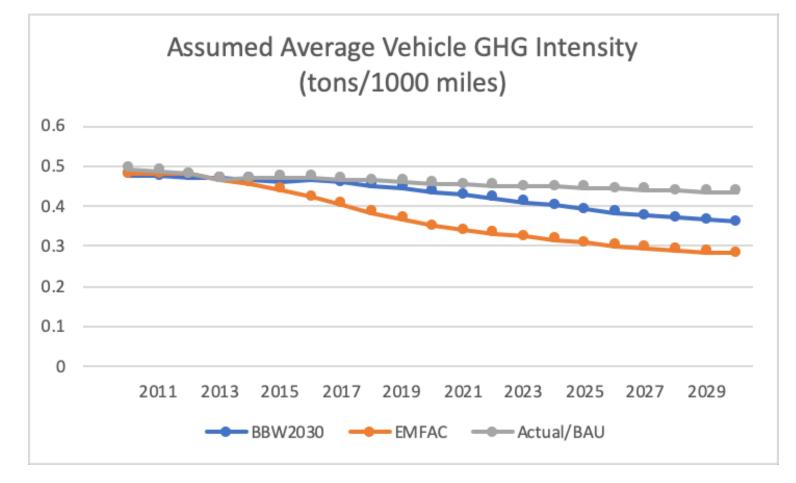
Emissions Excluding Electricity are Following BAU



Solid line shows actual values; Stairstep line shows annual broad scope cap level

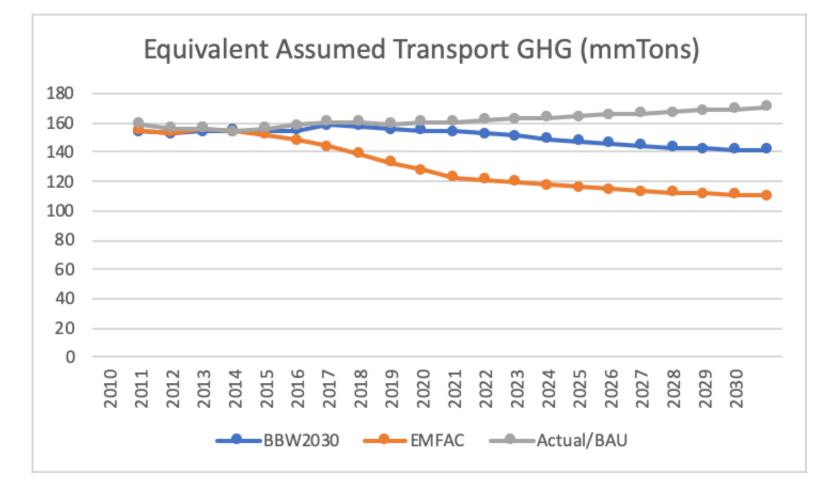


Transportation: Scoping Plan Assumes a Stark Break from Trend Starting Now





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BAU Uncertainty Dominates the 2030 Compliance Outlook

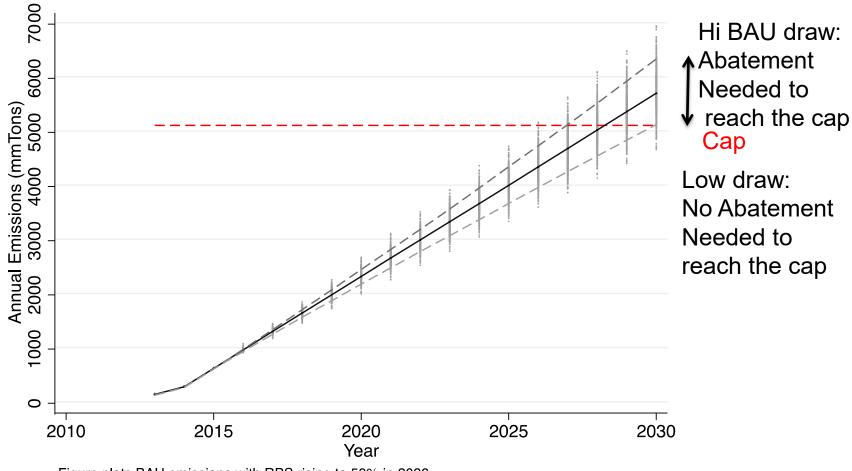
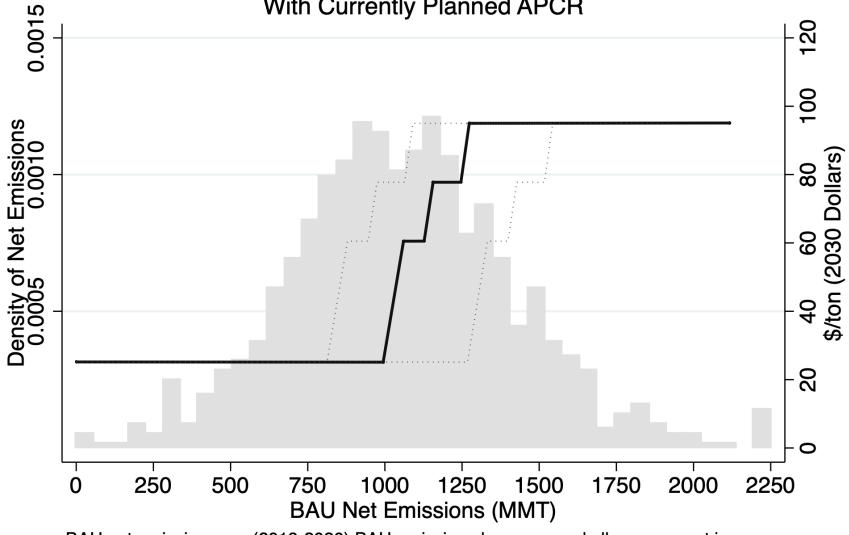


Figure plots BAU emissions with RPS rising to 50% in 2030



Net Emissions and Abatement Supply 2018-2030

With Currently Planned APCR

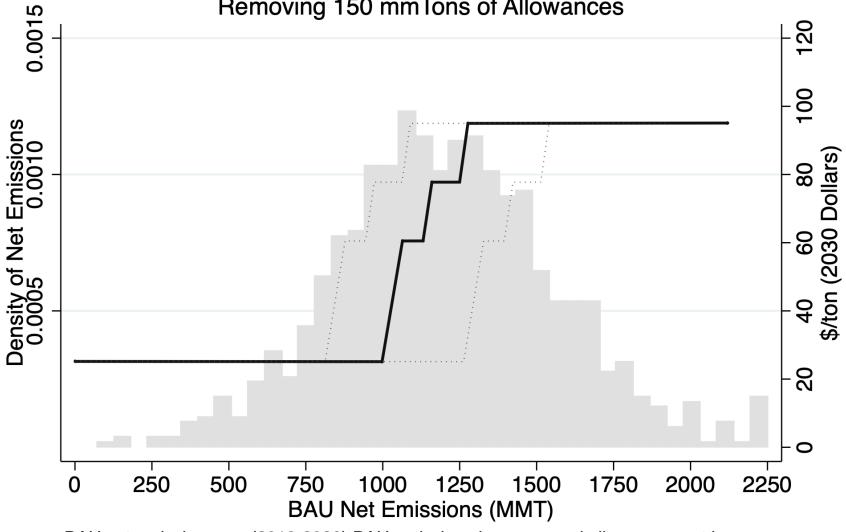


BAU net emissions are (2018-2030) BAU emissions less unusued allowances not in reserves



Net Emissions and Abatement Supply 2018-2030

Removing 150 mmTons of Allowances



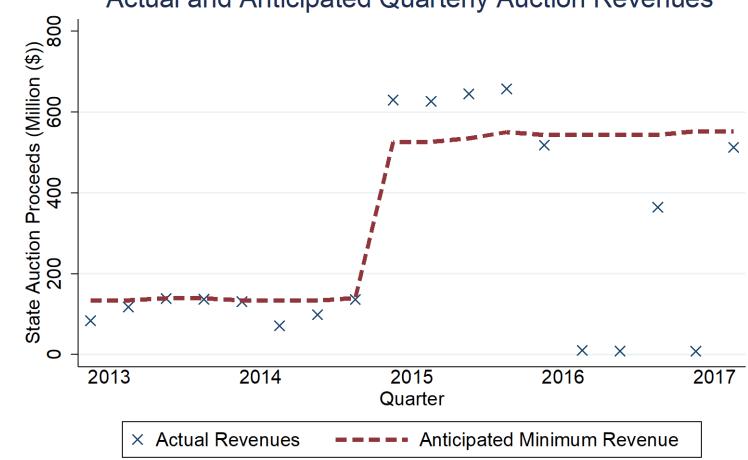
BAU net emissions are (2018-2030) BAU emissions less unusued allowances not in reserves



Supporting the Floor Price (ARP)

- Since 2013 the cost of supporting the floor price has fallen completely on government allowance sales
 - Freely allocated allowances are not adjusted when auctions clear at the floor
 - Reduction in allowance sales come from government shares
- This was a major source of revenue volatility between 2015 and 2017
- An alternative approach would reduce allocations proportionally with unsold government allowances



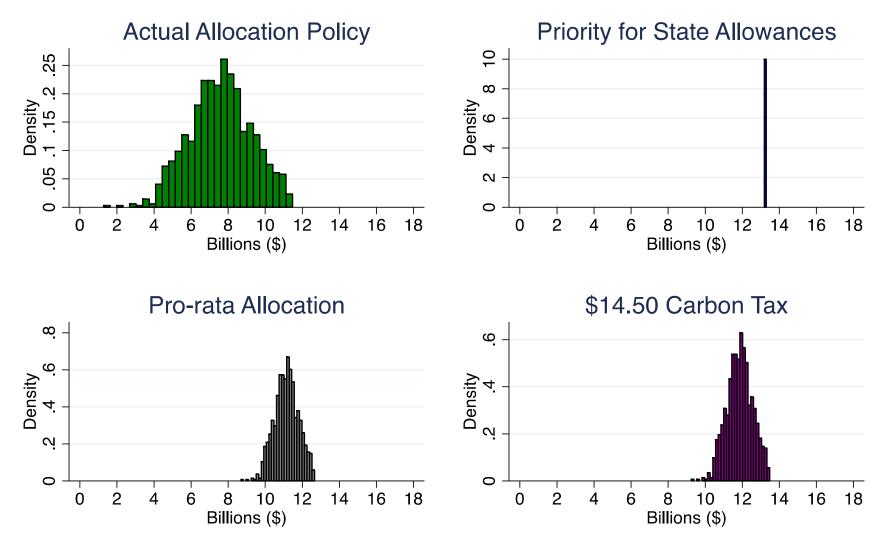


Actual and Anticipated Quarterly Auction Revenues

Includes sales of both current and future vintages Anticipated revenues assume full sales at price floor



Expected Revenues by Allocation Policy



Conditional on cap prices being at price floor Emissions quantities from Borenstein, et al. (2016)

ENERGY ECONOMICS PROGRAM

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Summary thoughts

- Allowance availability first and foremost impacts the market through price expectations
 - Price step and ceiling *levels* as important as allowance quantity in this sense
- Positioning state planning and policy to prioritize meeting only a 2030 target is bad policy
- Transportation and Industry Sectors need to show dramatic change in trend to support scoping plan assumptions
- If allowance market price is at the Floor, the State will Continue to bear the full cost of supporting the Auction Reserve Price
 - Reducing all allocations pro-rata to unsold amounts would distribute cost of supporting the floor price more evenly amongst stakeholders



Thank you

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