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EU ETS: Role of Financial Sector

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Tsinghua-ANU forum on climate and energy policy research

15th of September 2014, Beijing

www.ceem.unsw.edu.au



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Time travel back to 2005-2007 Phase 1

- European Union Transaction Log (EUTL called CITL) provides information on all transfers in the registry including names of account holders

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The EUTL

- Records all transactions of EUAs, CERs, ERUs including allocation, surrendering.
- Published with a 5 year delay (now: Jan 05 – Dec 09): Since permits can be surrendered until April of the following year, this means Phase 1 is up to April 2008.
- Only physical transactions (no price information)
- Additional information on account holders (two different types)
- Data on installation basis, matching to companies manually on the basis of account holder names, email addresses, web research, etc.

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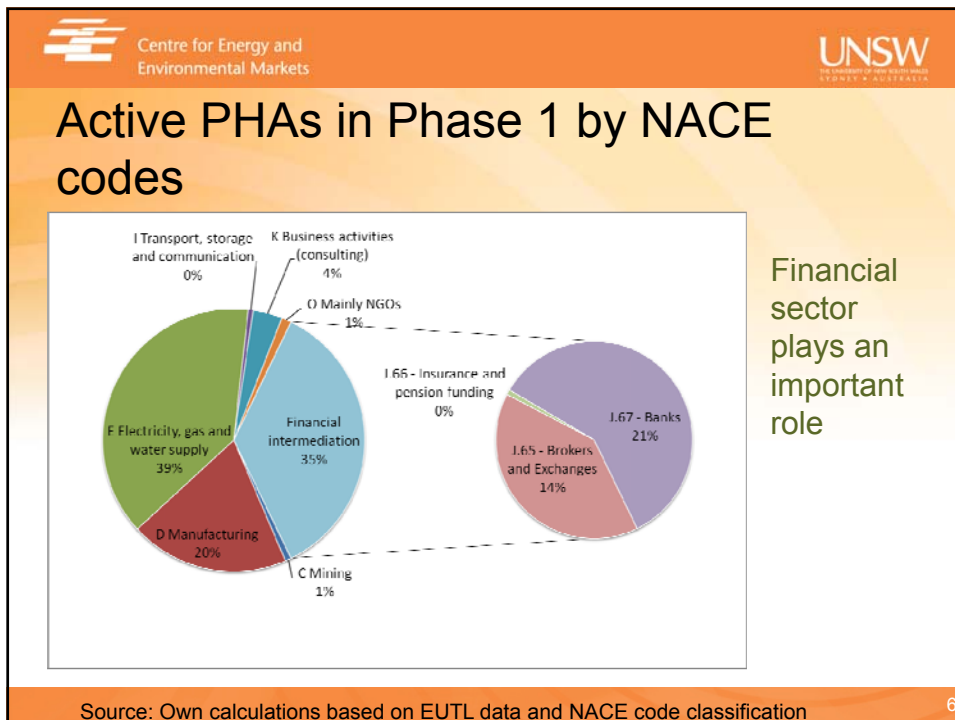
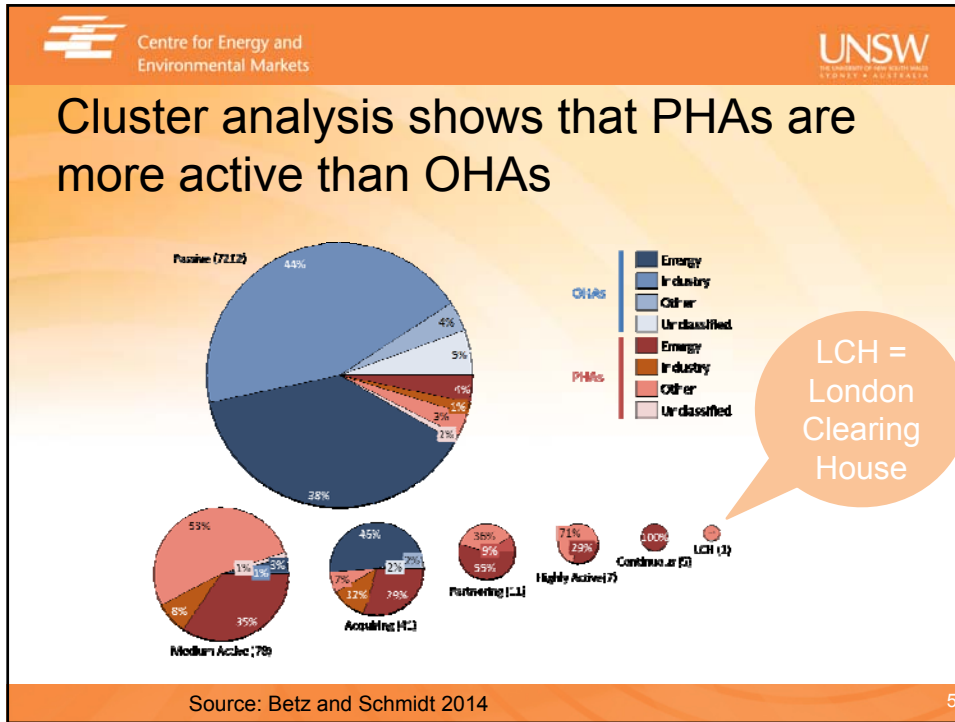


Two types of Market Players

- | | |
|---|---|
| <ul style="list-style-type: none">▪ Regulated players<ul style="list-style-type: none">– Phase 1: 12,844 Operation Holding Accounts (OHAs)– Free allocation– Compliance incentive– Information about own emissions and abatement costs | <ul style="list-style-type: none">▪ Non-regulated players<ul style="list-style-type: none">– Around 5,000 PHAs– Phase 1: 650 active Person holding accounts (PHAs)– Have to buy permits first in order to take part in market |
|---|---|

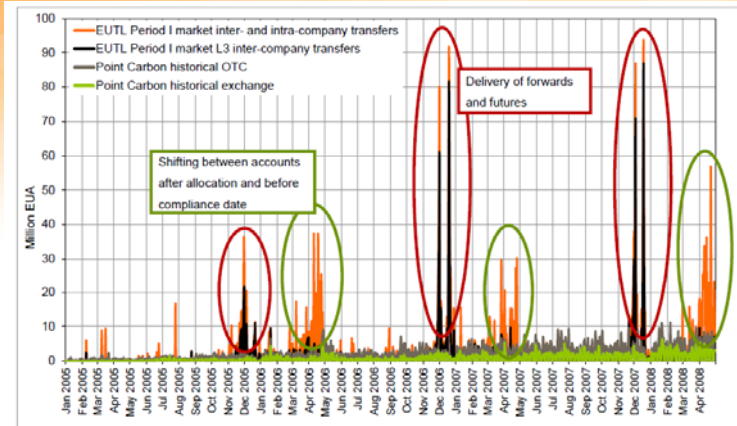
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Transfer volumes during the first trading period: OTC and exchange (Point Carbon) vs. EUTL data



Derivative market plays a dominant role

Source: Cludius 2014

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Dominant role of financial & energy sector

Entities with highest transaction volumes on forward and futures delivery days

Company	Volume on forward / futures days (M)	Representing a share of		Company	Volume on forward / futures days (M)	Representing a share of	
		The company's total trading volume in Period I	Total trading volume on forward / futures days			The company's total trading volume in Period I	Total trading volume on forward / futures days
Clearing house, exchange				Utilities			
LCH Clearnet	204	91%	17%	ELECTRICITE DE FRANCE	40	67%	3%
NASDAQ OMX (Nordpool)	9	11%	1%	RWE AG	28	42%	2%
CDC	6	5%	1%	E.ON SE	25	35%	2%
Financial actors				Energy			
UBS AG*	119	82%	10%	SSE PLC	22	60%	2%
Calyon Financial	71	89%	6%	ENEL SPA	18	27%	2%
BARCLAYS PLC*	68	43%	6%	ENBW AG	18	57%	1%
AGEAS SANV*	34	38%	3%	GDF	16	19%	1%
BNP PARIBAS*	33	72%	3%	ESSENT N.V.	16	59%	1%
MORGAN STANLEY*	25	58%	2%	ALLIANDER N.V.	15	41%	1%
GOLDMAN SACHS GROUP*	25	78%	2%	IBERDROLA SA	14	67%	1%
SOUCIETE GENERALE	18	48%	1%	CENTRICA PLC	13	35%	1%
ROYAL BANK OF SCOTLAND	13	49%	1%	DRAX GROUP PLC	12	56%	1%
COMMERZBANK AG	13	37%	1%	CEZ A.S.	12	67%	1%
SAL OPPENHEIM JR. & CIE.*	9	53%	1%	VATTENFALL AB	12	35%	1%
NUCLEAR LIABILITIES FUND	9	74%	1%	Deeside Power Limited	8	25%	1%
PCE Investors	8	67%	1%	VEOLIA ENVIRONNEMENT	7	33%	1%
MERRILL LYNCH & CO.*	8	34%	1%	Sempra Energy Europe Ltd.	7	44%	1%
DEUTSCHE BANK AG*	6	33%	1%				
Industry							
SANT GOBAN SA	19	39%	2%	ROYAL DUTCH SHELL	24	41%	2%
RHODIASA	10	43%	1%	BP PLC	18	41%	1%
				BHP BILLITON LIMITED	9	76%	1%
				TOTAL S.A.	8	56%	1%

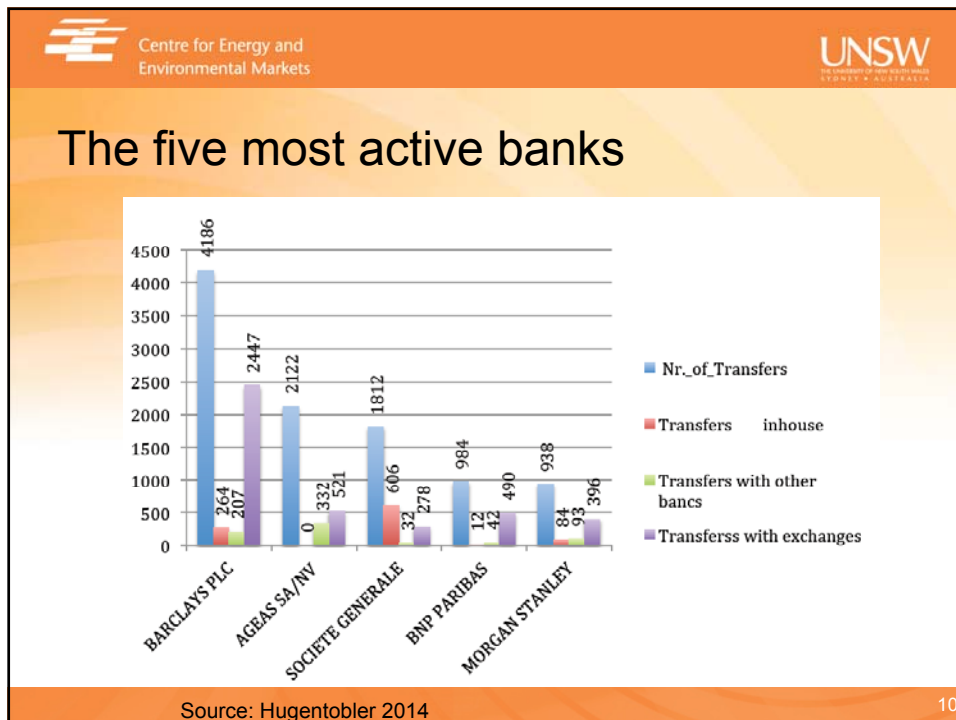
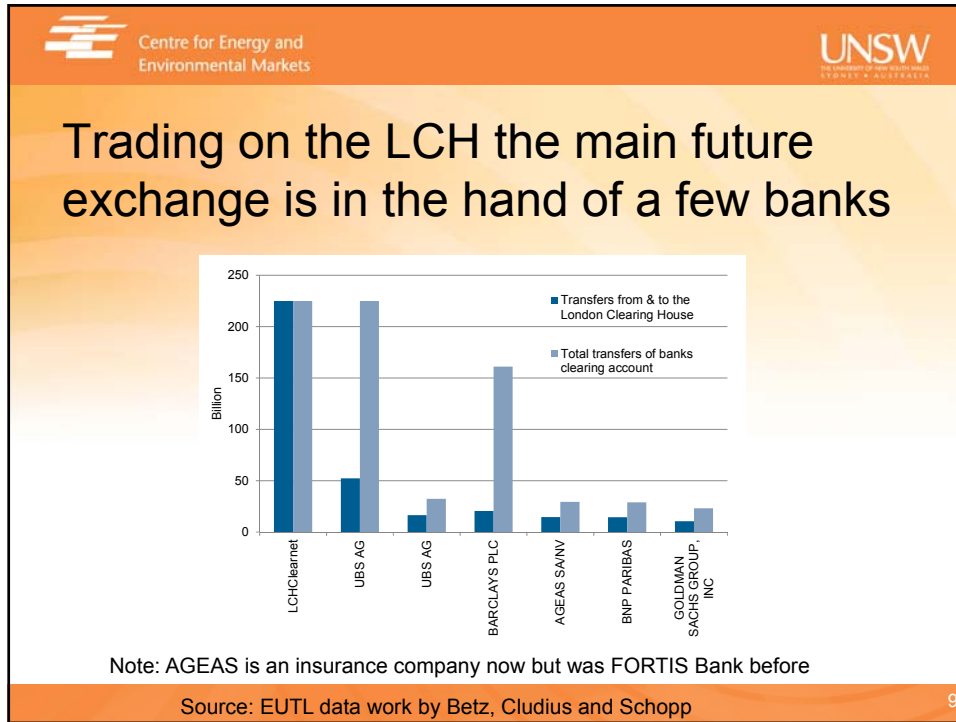
Source: EUTL, own estimation

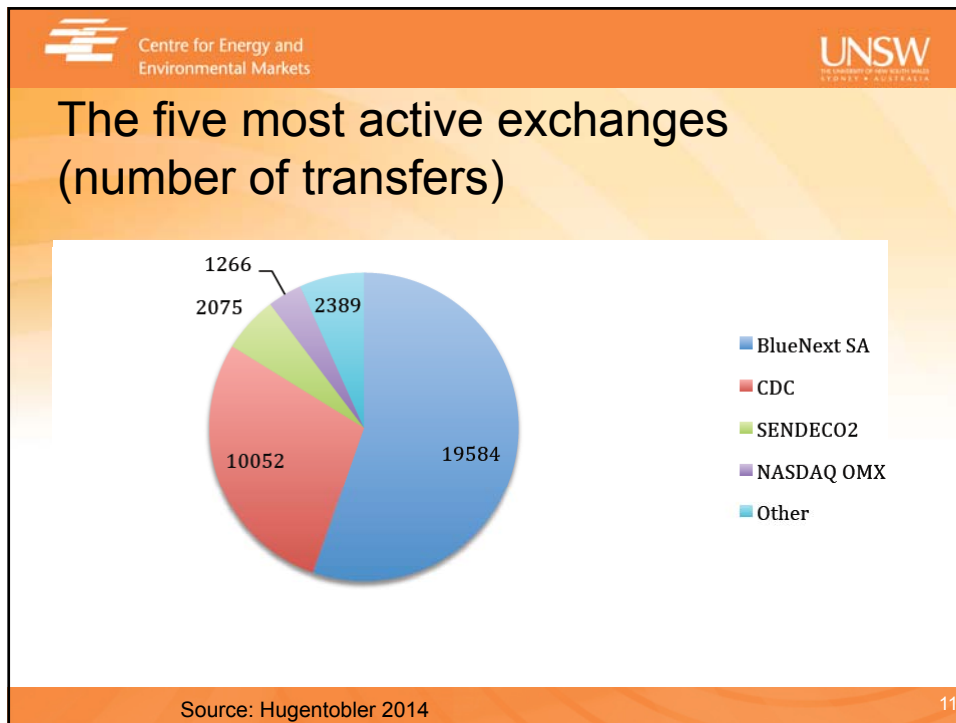
Note: All of the companies shown are involved in at least 1% of the total volume transacted on those days; * denotes accounts that have direct transactions with LCH Clearnet (clearing accounts)

Source: Cludius 2014

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Various Roles of Financial Sector

Banks roles with regard to EU ETS market:

- **Hedging partner:** Provide hedging products (futures and forwards) to manage price risk for regulated companies mainly electricity industry
- **Intermediation:** Broker for small companies which have no access to exchanges.
- **Aggregator:** Acquire surplus allowances from smaller companies, lower transaction costs and improve efficiency
- **Market maker:** provide liquidity by frequently quoting bids and offers with a maximum spread of 5 cents. In return they receive a special discount from the exchange.
- **Finance and service provider:** borrow permits and surrender them with a certain interest rate or manage EUAs for clients
- **Speculator and Arbitrageur**
- **Market Analyst:** Provide information to the market through publications

Exchanges roles:

- Provide different products like standardised **future contracts**
- Provide **clearing** and reduce risk and transaction costs
- Provide price and volume **information**



Today Phase 3

Change in EU ETS Design

- 50% free allocation and 50% auctioning

Financial Sector changes

- Main spot exchanges like BlueNext close down end of 2012
- EEX becomes major spot exchange and provides main auction platform
- ICE ECX is the most active future exchange
- Many banks closed down commodity trading desks due to new regulations for commodity trading which have been introduced after the financial crises
- New trading companies are formed
- Those overtake “bank roles” as they do not fall under financial regulations
- Banks may pursue cost of carry arbitrage, e.g. buy spot from auction/industry, hold EUA and sell futures to electricity providers

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Summary and policy conclusions

- Financial sectors reduces transaction costs by providing exchanges
- High number of exchanges at the beginning lead to competition which did increase liquidity through market makers and ended with only 2 main exchanges (EEX and ICE)
- Banks reduced number of expired EUAs by actively aggregating EUAs from small companies
- Banks were hedging counterparties for electricity industry, but they close down their trading desks
- Service and trading companies are taking over the role of banks since they do not fall under the new regulations and banks provide cheap money

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Final Thoughts

How would an ETS without financial sector/ non-regulated company involvement look like?

- Less liquidity on spot and derivative markets (less market makers and hedging partners)
- Higher transaction costs (less competition of exchanges)
- Lower participation in trading (no aggregators)

Would this market be less volatile?

- Most likely not since energy sector, which is regulated, played similar roles e.g. market maker, aggregator, speculator

What may be the consequences if banks drop out and others are taking over their roles?

- ...this needs research and will be the trip into the future



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Thank you.



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