
RGGI Inc.



**MARKET MONITOR REPORT
FOR AUCTION 34**

Prepared for:

RGGI, Inc., on behalf of the RGGI Participating States

Prepared By:

**POTOMAC
ECONOMICS**

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The Regional Greenhouse Gas Initiative (RGGI) is the first mandatory market-based regulatory program in the U.S. to reduce greenhouse gas emissions. RGGI is a cooperative effort of Northeast and Mid-Atlantic states to reduce emissions of carbon dioxide (CO₂) from the power sector.

RGGI, Inc. is a non-profit corporation created to provide technical and administrative services to the states participating in the Regional Greenhouse Gas Initiative.

MARKET MONITOR REPORT FOR AUCTION 34

As the Market Monitor for the RGGI CO₂ allowance market, Potomac Economics monitors the conduct of market participants in the auctions and in the secondary market to identify indications of market manipulation or collusion. We also review the administration of the auctions by EnerNOC, Inc. This report summarizes our findings regarding RGGI Auction 34, which was held on December 7, 2016.

We observed the auction as it occurred and have completed our review and analysis of its results. Based on our review of bids in the auction, we find no material evidence of collusion or manipulation by bidders.

Thirty-three bidders participated in the offering of CO₂ allowances. Bids were submitted to purchase 2.4 times the available supply of allowances, resulting in a clearing price of \$3.55 per ton. Compliance-Oriented Entities purchased 40 percent of the allowances in the offering. There was no indication of barriers to participation in the auction.

Based on our review of the administration of the market, we found that:

- The auction was administered in a fair and transparent manner in accordance with the noticed auction procedures and limitations.
- The auction results were consistent with the market rules and the bids received.
- Sensitive information was treated appropriately by the auction administrator.
- There were no indications of issues with the auction platform such as hardware or software problems, communications issues, or security breaches.

In summary, the results of our monitoring of RGGI Auction 34 raise no material concerns regarding the auction process, barriers to participation in the auction, or the competitiveness of the auction results. The appendix provides additional information about the market for RGGI CO₂ allowances and outcomes of the auction.

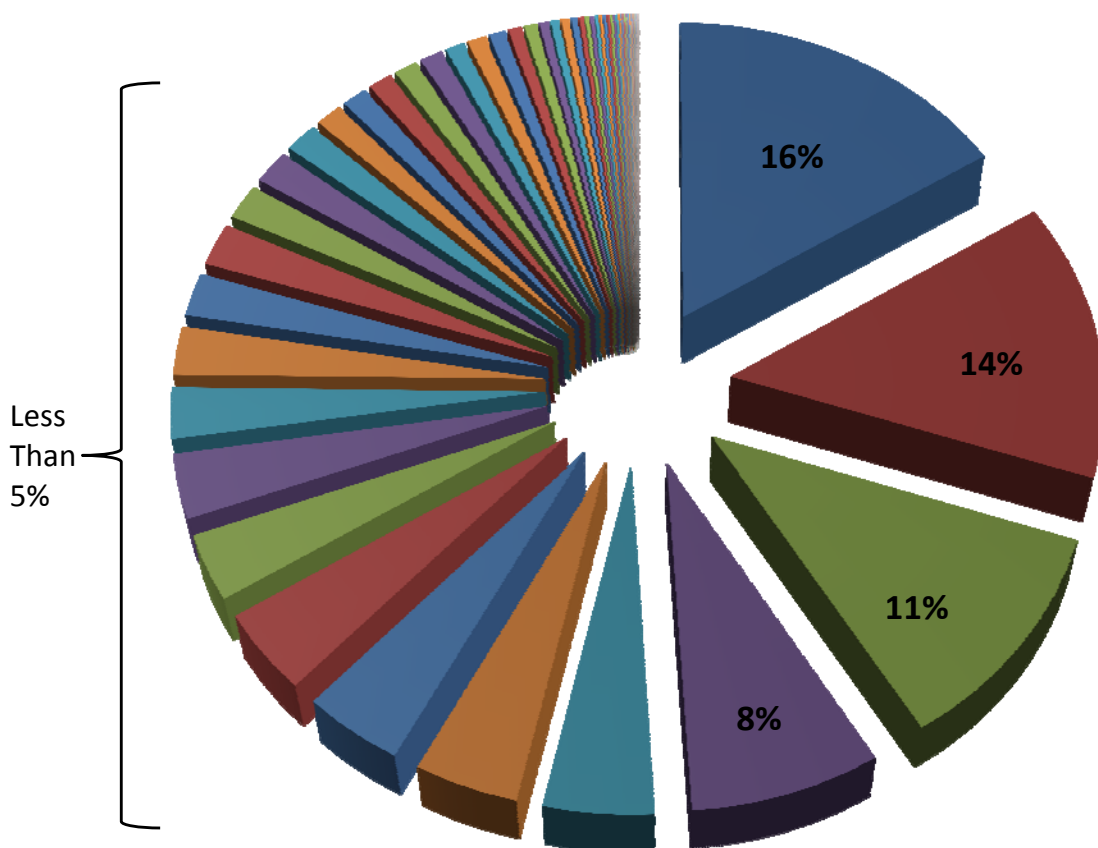
APPENDIX

A. DISPERSION OF PROJECTED DEMAND

The wide dispersion of projected demand for RGGI allowances across compliance entities facilitates the competitive performance of the auction.

The following figure shows the relative shares of projected demand for RGGI allowances by compliance entity in the current control period. The largest compliance entity represents only 16 percent of the total projected demand for allowances. Half of the projected demand is composed of entities that each account for less than 5 percent of the total demand. Participation by a large number of entities facilitates the competitive performance of the auction.

Figure 1: Projected Demand for RGGI Allowances Shares by Compliance Entity



B. SUMMARY OF PURCHASES OF ALLOWANCES IN AUCTION 34

Awards were distributed across 29 bidders with five bidders purchasing one million tons or more and nine bidders purchasing 300,000 tons or more.

This report summarizes participation for three categories: Compliance Entities¹; Compliance-Oriented Entities and Other Entities.

- *Compliance Entities* – Includes firms with compliance obligations.
- *Compliance-Oriented Entities* – Includes compliance entities that appear to acquire and hold allowances primarily to satisfy their compliance obligations.
- *Other Entities* – Includes:
 - ✓ Firms without any compliance obligations, and
 - ✓ Firms that have compliance obligations but which hold a number of allowances that exceeds their estimated compliance obligations by a margin that suggests they are also buying for re-sale or some other investment purpose.²

In Auction 34, Compliance Entities purchased 71 percent of the allowances sold. In the first 34 RGGI auctions, Compliance Entities purchased 77 percent of the allowances sold. In Auction 34, Compliance-Oriented Entities purchased 40 percent of the allowances sold.

After settlement of allowances sold in Auction 34:

- Fifty-three percent of the allowances in circulation will be held by Compliance-Oriented Entities.
- Fifty-nine percent of the allowances in circulation are believed to be held for compliance purposes. The number of allowances that are believed to be held for compliance purposes includes 100 percent of the allowances held by Compliance-Oriented Entities and a portion of allowances held by Other Entities for compliance purposes.

¹ This includes affiliates of the compliance entity, including firms that: (i) have a parent-subsidiary relationship with a compliance entity, (ii) are subsidiaries of a parent company that has a large interest in a compliance entity, (iii) have substantial control over the operation of a budget source and/or responsibility for acquiring RGGI allowances to satisfy its compliance obligations.

² The assessment of whether a compliance entity holds a number of allowances that exceeds its compliance obligations by a margin that suggests they are also buying for re-sale or some other investment purpose is based on: (a) the entity's forecasted share of the total compliance obligations for the entire RGGI footprint through 2020 and (b) the total number of allowances in circulation.

The following table shows the quantity of allowances purchased by each bidder. The identity of each bidder is masked, and the bidders are ranked according to the amount of allowances awarded, from largest to smallest.

Table 1: Quantity of Allowances Awarded by Bidder

Bidder	Number of Allowances Awarded
Bidder 1	3,697,000
Bidder 2	2,773,000
Bidder 3	2,618,315
Bidder 4	1,001,000
Bidder 5	1,000,000
Bidder 6	900,000
Bidder 7	407,000
Bidder 8	311,000
Bidder 9	300,000
Bidder 10	278,000
Bidder 11	250,000
Bidder 12	240,000
Bidder 13	150,000
Bidder 14	125,000
Bidder 15	100,000
Bidder 16	90,000
Bidder 17	75,000
Bidder 18	66,000
Bidder 19	65,000
Bidder 20	62,000
Bidder 21	60,000
Bidder 22	55,000
Bidder 23	50,000
Bidder 24	40,000
Bidder 25	33,000
Bidder 26	14,000
Bidder 27	12,000
Bidder 28	10,000
Bidder 29	9,000

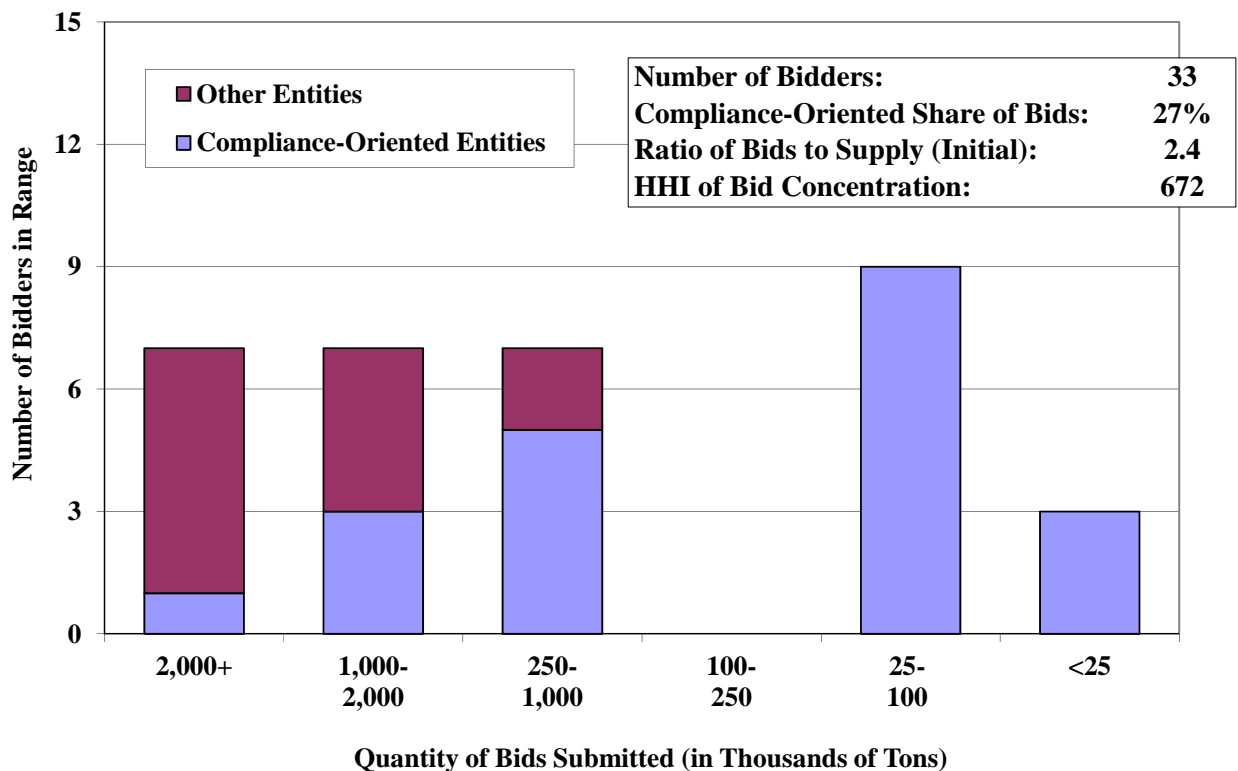
C. DISPERSION OF BIDS IN AUCTION 34

Bids were submitted by 21 Compliance-Oriented Entities and 12 Other Entities. In our review of the bids and the qualification process, we found no material evidence of anti-competitive conduct or inappropriate barriers to participation.

The following figure summarizes the quantity of allowances for which bids were submitted by each bidder. One Compliance-Oriented Entity and six Other Entities submitted bids for a large quantity of allowances (i.e., at least 2 million tons). Overall, Compliance-Oriented Entities accounted for 27 percent of the quantity of allowances for which bids were submitted. The quantity of allowances for which bids were submitted was 2.4 times the available supply. In Auction 33, the quantity of allowances for which bids were submitted was 2.8 times the Initial Offering.

The bid quantities were widely distributed among the 33 bidders. The concentration of bids, using the Herfindahl-Hirschman Index (“HHI”), is relatively low at 672, consistent with recent auctions. The HHI is a standard measure of concentration calculated by squaring each entity’s share and then summing the squares across all entities (i.e., the index ranges from 0 to 10,000).

**Figure 2: Quantity of Bids Submitted by Entity
By Type of Entity and Quantity Bid**



D. SUMMARY OF BID PRICES IN AUCTION 34

Bids were submitted across a wide range of prices in the auction and the clearing price of \$3.55 was relatively consistent with average bid prices submitted.

The following table reports several statistics regarding the bid prices for bids submitted in Auction 34. The median and mean bid prices are weighted by the quantity of each bid.

Bid Prices:	
Minimum	\$2.10
Maximum	\$13.75
Average (Median)	\$3.46
Average (Mean)	\$3.40
Clearing Price:	\$3.55

E. NAMES OF POTENTIAL BIDDERS IN AUCTION 34

In accordance with Sections 2.8 and 3 of the Auction Notice for CO₂ Allowance Auction 34, the Participating States are releasing the names of Potential Bidders in Auction 34. The states defined potential bidders as: “Each Applicant that has been qualified and submitted a complete *Intent to Bid.*” The list of 48 Potential Bidders is as follows:

Astoria Energy, LLC	Kendall Green Energy, LLC
Biourja Nehme Commodities, LLC	KMC Thermo, LLC
BP Products North America Inc.	Koch Supply & Trading, LP
Brooklyn Navy Yard Cogen Partners, LP	Luminus Energy Partners Master Fund, Ltd.
Caithness Long Island, LLC	Macquarie Energy, LLC
Calpine Energy Services, LP	Massachusetts Muni. Wholesale Elec. Co.
Castleton Commodities Merchant Trading, LP	Maxim Power (USA), Inc.
Cayuga Operating Company, LLC	Mercuria Energy America, Inc.
City of Dover	Morgan Stanley Capital Group, Inc.
Consolidated Edison Comp. of NY, Inc.	National Grid Gen. dba National Grid
Delaware City Refining Company, LLC	NextEra Energy Power Marketing, LLC
Delaware Municipal Electric Corp.	NRG Power Marketing, LLC
Direct Energy Business Marketing, LLC	Old Dominion Electric Cooperative
Dominion Energy Marketing, Inc.	Power Authority of the State of New York
DRW Commodities, LLC	PSEG Energy Resources & Trade, LLC
DTE Energy Trading, Inc.	Public Service Company of New Hampshire
Energie Row, LLC	RBC
Exelon Generation Company, LLC	Selkirk Cogen Partners, LP
Five Rings Capital, LLC	Statkraft Markets GmbH
GDF SUEZ Energy Marketing NA, Inc.	Taunton Municipal Lighting Plant
GenOn Energy Management, LLC	Verso Corporation
Hawkeye Energy Greenport	Village of Freeport
Indeck-Corinth Limited Partnership	Vitol Inc.
J-Power USA Development Co., Ltd.	Wallingford Energy, LLC