



**REPORT ON THE SECONDARY MARKET  
FOR RGGI CO<sub>2</sub> ALLOWANCES: FOURTH QUARTER 2014**

**Prepared for:**

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

**Prepared By:**



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The Regional Greenhouse Gas Initiative (RGGI) is a cooperative effort of Northeast and Mid-Atlantic states to reduce emissions of carbon dioxide (CO<sub>2</sub>) 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.

## A. INTRODUCTION AND SUMMARY

The primary market for RGGI CO<sub>2</sub> allowances consists mainly of the auctions where allowances are initially sold. Once a CO<sub>2</sub> allowance is purchased in the primary market, it can then be resold in the secondary market. The secondary market for RGGI CO<sub>2</sub> allowances comprises the trading of physical allowances and financial derivatives, such as futures and options contracts.

The secondary market is important for several reasons. First, it gives firms an ability to obtain CO<sub>2</sub> allowances at any time during the three months between the RGGI auctions. Second, it provides firms a way to protect themselves against the potential volatility of future auction clearing prices. Third, it provides price signals that assist firms in making investment decisions in markets affected by the cost of RGGI compliance.

This report provides a summary of activity in the secondary market in the fourth quarter of 2014 and discusses the results of our market power screens. Several patterns have emerged in this period in the secondary market:

- *CO<sub>2</sub> Allowance Prices* – The average transfer price of CO<sub>2</sub> allowances in COATS during the fourth quarter of 2014 was \$5.22, approximately 7 percent higher than in the prior quarter and 69 percent higher than the fourth quarter of 2013. Prices increased steadily throughout the quarter, rising from approximately \$4.95 at the start of October to a daily high of \$5.32 in mid-December.
- *Secondary Market Activity* – Trading increased significantly from previous quarters as compliance entities prepared to satisfy their compliance obligations for the second control period by the March 2, 2015 deadline. The volume of:
  - ✓ CO<sub>2</sub> allowance transfers between unaffiliated firms was 41.6 million, up from 14.2 million allowances in the previous quarter and from 35.6 million allowances in the fourth quarter of 2013; and
  - ✓ Futures trading was 53.7 million allowances in the fourth quarter of 2014, up from 11.2 million in the prior quarter and from 45.9 million in the fourth quarter of 2013.
- *CO<sub>2</sub> Allowance Holdings* – The share of CO<sub>2</sub> allowances that were held by compliance entities and their affiliates at the end of the fourth quarter of 2014 was approximately 81 percent out of 403 million allowances in circulation. Approximately 66 percent of the allowances in circulation will be needed for second control period compliance.

We evaluate information on the holdings of CO<sub>2</sub> allowances and allowance derivatives as well as the demand for allowances to identify firms that may have acquired a position that raises competitive concerns. In the current study period, we find no evidence of anticompetitive conduct.

## B. BACKGROUND

The secondary market for RGGI CO<sub>2</sub> allowances comprises the trading of physical allowances and financial derivatives, such as futures, forward, and option contracts. A physical allowance trade occurs when the parties to the transaction register the transfer of ownership in RGGI's CO<sub>2</sub> Allowance Tracking System ("COATS"). Financial derivatives include any contracts whereby parties agree to exchange funds and/or allowances at some future date, depending in many cases on factors such as the price of allowances at some future date. Many financial derivatives eventually result in the transfer of physical CO<sub>2</sub> allowances (i.e., the transfer is registered in COATS), but this may occur months or years after the parties enter into a financial transaction. These include the following types of transactions:

- *Futures* – Under these contracts, two parties agree to exchange a fixed number of CO<sub>2</sub> allowances of a certain vintage year at a particular price at a specific point in the future (called the "delivery month"). At the end of the delivery month, the contracted number of CO<sub>2</sub> allowances must be physically transferred to the buyer's account in the COATS registry and funds must be transferred to the seller. The vintage year refers to the compliance year of the CO<sub>2</sub> allowance that is to be transferred. One standard futures contract equals 1,000 RGGI allowances.<sup>1</sup>
- *Forwards* – These are like futures contracts, but a forward contract typically requires that all financial settlement occur at expiration.
- *Call Options* – Call options give the purchaser the option to buy a fixed number of CO<sub>2</sub> allowances of a certain vintage year at a particular strike price at any time prior to the expiration date. For example, suppose a firm holds a call option with \$5 strike price, and December 2014 expiration date. If the price of the corresponding forward contract rose to \$5.75, the firm could exercise the option to buy CO<sub>2</sub> allowances at \$5 and immediately sell them at \$5.75. Alternatively, if the price of the forward contract stayed below \$5, the firm

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<sup>1</sup> More precisely, a futures contract requires parties with an open interest to post financial assurance in an account with the exchange until the contract reaches expiration. The exchange continually withdraws and deposits funds according to changes in the prices of the contracts in which the party has interest. For example, if a firm buys a contract for 1,000 allowances at \$3.50/allowance, the purchasing firm (firm with a long position) must put \$3,500 in an account (or whatever share of the entire liability the exchange requires). If the futures price declines to \$3/allowance, the exchange transfers \$500 from the account of a firm with a long position to the account of a firm with a short position (firm that sold a contract), and the firm with a long position is only required to keep \$3,000 in the account. At the end of the delivery month, allowances are exchanged for funds according to the closing price on the last day of the month.

would let the option expire without exercising it. One standard options contract can be exercised for 1,000 RGGI allowances.

- *Put Options* – Put options are similar to call options but they give the purchaser the option to *sell* a certain number of CO<sub>2</sub> allowances of a particular vintage year at a specified strike price any time prior to the expiration date.

Futures, forward, and option contracts allow firms to manage risks associated with unforeseen swings in commodity prices. Futures and forwards allow firms to lock-in the prices of future purchases or sales. Options allow firms to limit their exposure to price volatility. Call options protect the purchaser if the price of the commodity increases, while put options protect the purchaser if the price of the commodity decreases. Although options provide less certainty than futures and forwards, they usually require less financial security, making them more attractive to some firms.

The terms of futures, forward, and option contracts vary in the degree to which they are standardized. “Exchange-traded” contracts typically have the most standardized provisions, while the term “over-the-counter” (“OTC”) is applied to contracts with less standardized provisions. However, OTC contracts, once entered into, are often settled through a clearinghouse in order to protect the parties from the risk that the counterparty defaults.

The amount of *open interest* is the net amount of futures, forwards, or options that have been traded for a contract with a particular set of specifications (i.e., vintage year, delivery month, etc.), but have not reached the time of delivery, expired, or been exercised. For example, if Firm A sells 100 contracts of a particular type to Firm B, Firm A will have a short position of 100 contracts, Firm B will have a long position of 100 contracts, and the total open interest for the particular type of contract will be 100 contracts. Hence, the total open interest can be determined by summing across all of the long positions of market participants or by summing across all of the short positions.

The volatility of a CO<sub>2</sub> allowance refers to the expected standard deviation of the distribution of allowance prices one year in the future. For example, if the expected value of the price one year in the future is \$1 and the option-implied volatility is 25 percent, this implies that the probability that the price will be within 25 percent of \$1 (i.e., between \$0.75 and \$1.25) is 68.2 percent

assuming that the price is distributed log-normally. Option-implied volatility refers to volatility estimates that are derived by analyzing the price and other terms of an option contract compared with the price of CO<sub>2</sub> allowances.

### C. SUMMARY OF PRICES

This section summarizes prices in the secondary market for RGGI CO<sub>2</sub> allowances in the fourth quarter of 2014. Figure 1 summarizes transaction prices in the secondary market for CO<sub>2</sub> allowances, including the prices of allowance transfers registered in COATS<sup>2</sup> and the prices of futures contract trades on the Intercontinental Exchange (“ICE”). Figure 2 summarizes the option-implied (i.e., expected) volatility of RGGI CO<sub>2</sub> allowance prices based on an analysis of the trading of options contracts.<sup>3</sup> Key observations regarding RGGI CO<sub>2</sub> allowance prices:

- The average transfer price of CO<sub>2</sub> allowances in COATS during the fourth quarter of 2014 was \$5.22, approximately 7 percent higher than in the prior quarter and 69 percent higher than the fourth quarter of 2013. Prices increased steadily throughout the quarter, rising from approximately \$4.95 at the start of October to a high of \$5.32 in mid-December.
- The clearing price in Auction 26 (held on December 3) was \$5.21. The clearing price was generally consistent with secondary market prices leading up to the auction, and it was 7 percent higher than the clearing price in Auction 25.
- Option-implied volatility ranged from 16 to 21 percent during the fourth quarter. Option-implied volatility has been trending-down throughout 2014.

#### *Prices of CO<sub>2</sub> Allowances and Allowance Derivatives*

Figure 1 summarizes prices in the secondary market during the period. The blue diamonds show the prompt month price of ICE futures on days with trading volume. The green triangles show the volume-weighted average prices of physical deliveries registered in COATS on days with transactions when the price was recorded (“COATS transactions”). The red circle shows the clearing price of the CO<sub>2</sub> allowances that were sold in RGGI Auction 26, which was held on December 3. Figure 1 also shows volume-weighted average prices for each category in the fourth quarter of 2014 compared to the previous quarter and the fourth quarter of the previous year. Volume-weighted average prices for the first, second, and third control period CO<sub>2</sub> allowances are shown together.

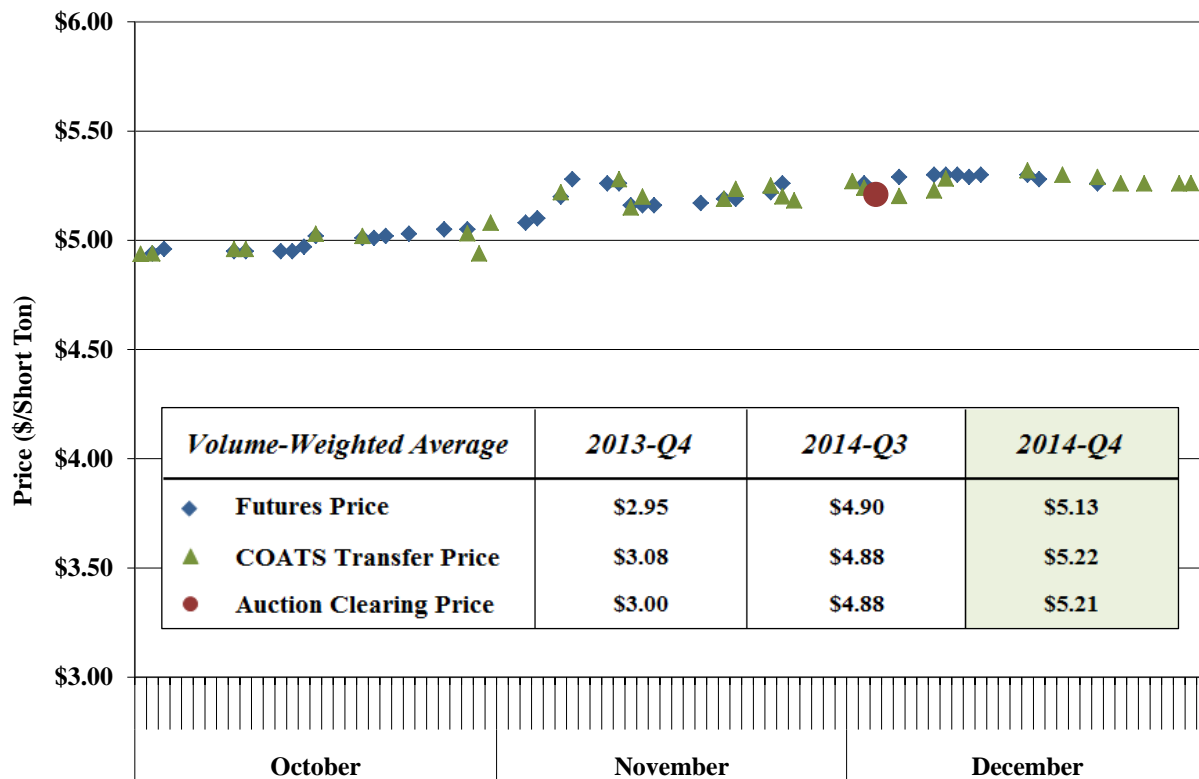
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<sup>2</sup> Parties are required to report the transaction price if there is an underlying financial transaction related to the transfer of allowances between accounts.

<sup>3</sup> The option-implied volatility of a CO<sub>2</sub> allowance refers to the expected standard deviation of the distribution of allowance prices one year in the future.



**Figure 1: Prices in the Secondary Market for RGGI CO<sub>2</sub> Allowances<sup>4</sup>  
October 1, 2014 to December 31, 2014**



Key observations regarding CO<sub>2</sub> allowance prices:

- The average transfer price of CO<sub>2</sub> allowances in COATS during the fourth quarter of 2014 was \$5.22, approximately 7 percent higher than in the prior quarter and 69 percent higher than the fourth quarter of 2013. Prices increased steadily throughout the quarter, rising from approximately \$4.95 at the start of October to a high of \$5.32 in mid-December.
- The prices of ICE futures trades were consistent with COATS transfer prices throughout the fourth quarter. The average futures price of \$5.13 was 5 percent higher than the average price in the prior quarter and 74 percent higher than in the fourth quarter of 2013. Average futures prices were lower than the average prices of COATS transfers because the volume of trading was higher for futures in the first half of the quarter, while the volume was higher for COATS transfers in the second half of the quarter.
- Futures trading was significant for both current control period CO<sub>2</sub> allowances (i.e., vintages 2009 to 2014) and future control period allowances (i.e., vintages after 2014). Although not

<sup>4</sup> Sources: Auction clearing prices are available at [www.rggi.org/market/co2\\_auctions/results](http://www.rggi.org/market/co2_auctions/results), ICE futures prices are available at [www.theice.com](http://www.theice.com), and the prices of physical deliveries are based on information in COATS. Futures prices are shown for the prompt month contract even if the volume traded was for another contract.

shown separately in the figure above, futures prices were consistent between the two groups of contracts throughout the fourth quarter of 2014.

- The clearing price in Auction 26, held on December 3, was \$5.21, which was generally consistent with secondary market prices leading up to the auction. The auction clearing price increased 7 percent from Auction 25 (which was held in September).

### *Prices of Options for CO<sub>2</sub> Allowances*

The clearing prices of option contracts provide insight about how the market expects the price of the underlying commodity to move in the future. The price of an option depends on two factors: (i) the expected value of the underlying commodity relative to the strike price of the option, and (ii) the expected volatility of the underlying commodity over the period before the expiration date. When call option price decreases coincide with put option price increases, it signals a decrease in the expected price of the underlying commodity. Conversely, when call option prices and put option prices move in the same direction, it signals a change in the expected volatility of the underlying commodity price.

Key observations regarding the pricing of options for CO<sub>2</sub> allowances in the fourth quarter of 2014:

- Nineteen option trades were recorded on ICE during the fourth quarter of 2014, up from eight trades in the previous quarter. Sixty-seven percent of the volume was for contracts with November or December 2015 expiration, while 19 percent of the volume was for contracts with December 2014 expiration.
- Fifty-one percent of the volume was for call options and 49 percent of the volume was for put options during the fourth quarter of 2014.
- The strike prices of the 11 call options sold during the fourth quarter of 2014 ranged from \$5.00 to \$6.00, while 8 put options were sold at strike prices of \$3.25 to \$5.35. These strike prices provide some indication of the market's expectations for the potential range of variation in allowance prices.

### *Volatility of CO<sub>2</sub> Allowance Prices*

Market-based emission reduction programs such as RGGI are designed to give firms efficient incentives to reduce or offset emissions. In the short-term, high-emitting generators will operate less frequently in favor of low-emitting generators. In the long-term, the market will affect the decisions of firms to develop offset projects, retire older inefficient generation, and perform

maintenance that increases fuel efficiency and lowers carbon-intensity. Predictable CO<sub>2</sub> allowance prices decrease the risks associated with making long-term investments in reducing CO<sub>2</sub> emissions. Since CO<sub>2</sub> allowance prices can be volatile, the availability of futures and options contracts allows firms to protect themselves from the risks of such investments.

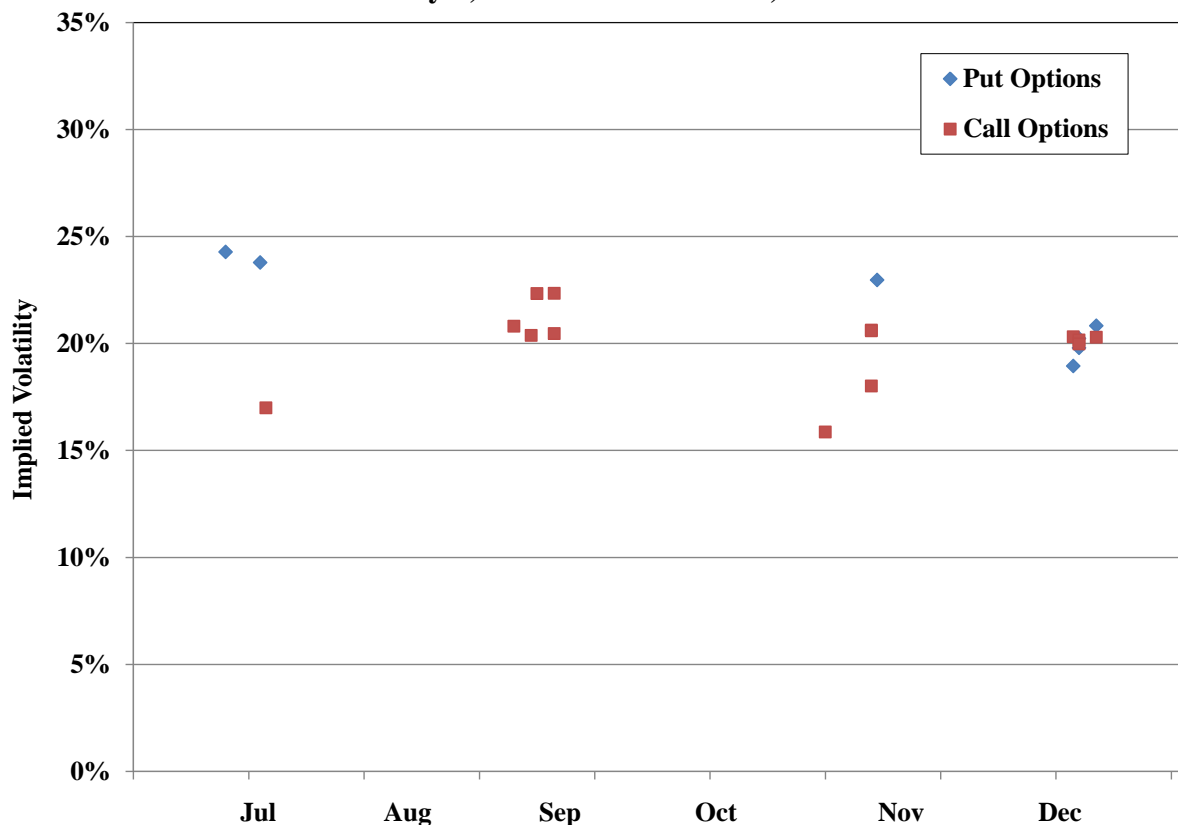
One measure of the volatility of CO<sub>2</sub> allowance prices is known as option-implied volatility, which measures the volatility that is implied by the trading of option contracts for CO<sub>2</sub> allowances. If a firm perceives that CO<sub>2</sub> allowance prices are volatile, the firm may be willing to pay a high price for an option contract that protects it from unforeseen allowance price fluctuations. Likewise, if a firm perceives that CO<sub>2</sub> allowance prices are relatively stable, the firm will be willing to pay relatively little for the same option contract.

The following scatter plot reports the option-implied (i.e., expected) volatility of RGGI CO<sub>2</sub> allowance futures contracts, which can be inferred from the trading of options contracts over the last six months of 2014.<sup>5</sup> The vertical axis shows the option-implied (expected) volatility of CO<sub>2</sub> allowance futures prices, and the horizontal axis shows the trade date. The figure excludes contracts if the trade date is less than 90 days prior to the expiration date. Excluding these contracts reduces variations in implied volatility that are driven by short-term issues such as the timing of the trades within a particular quarter (i.e. around the time of each quarterly auction).

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<sup>5</sup> Black's model for valuing futures options is used to estimate the option-implied volatilities of RGGI allowance futures prices.

**Figure 2: Option-Implied Volatility of CO<sub>2</sub> Allowance Futures Prices  
July 1, 2014 to December 31, 2014**



Observations regarding the option-implied volatility of CO<sub>2</sub> allowance prices:

- Option-implied volatility continued a downward trend that we have seen throughout 2014.
  - ✓ In the third quarter, there were eight trades where implied volatility ranged between 17 and 24 percent.
  - ✓ In the fourth quarter, there were 13 trades where implied volatility ranged between 16 and 21 percent. (This excludes trades of options with fewer than 90 days to expiration.)

## D. VOLUMES AND OPEN INTEREST

This section evaluates the volume of COATS transactions (i.e., transfers of CO<sub>2</sub> allowances between unaffiliated parties as recorded in COATS) as well as the volume of trading and the level of open interest in exchange-traded futures and options. Figure 3 examines the volumes of transactions recorded in COATS and of futures trading. Figure 4 summarizes the level of open interest in exchange-traded RGGI futures and option contracts. Figure 5 evaluates the concentration of firms with open interest in exchange-traded RGGI futures and option contracts.

Key observations regarding trading volumes and open interest in the fourth quarter of 2014:

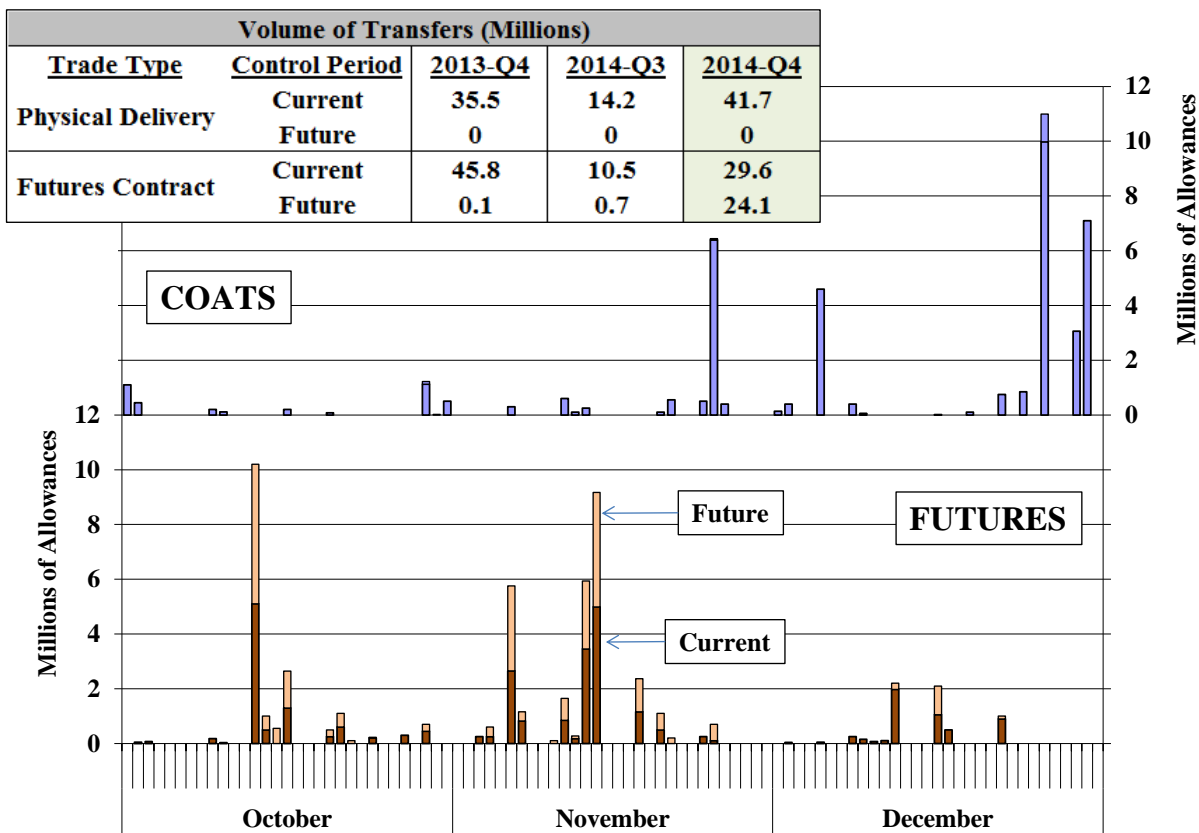
- Secondary market activity increased significantly from previous quarters as compliance entities prepared to satisfy their compliance obligations for the second control period by the March 2, 2015 deadline.
  - ✓ The volume of CO<sub>2</sub> allowance transfers between unaffiliated firms was 41.6 million, up from 14.2 million allowances in the previous quarter and from 35.6 million allowances in the fourth quarter of 2013.
  - ✓ The total volume of trading of RGGI futures listed on ICE was 53.7 million CO<sub>2</sub> allowances in the fourth quarter of 2014, up from 11.2 million in the prior quarter and from 45.9 million in the fourth quarter of 2013.
- Although the majority (55 percent) of futures trading volume was for contracts involving allowances usable for compliance in the second control period, trading of futures contracts for future control period allowances (i.e., vintages after 2014 and contracts expiring after the compliance deadline) increased dramatically in the fourth quarter of 2014.
- The open interest in RGGI options increased from 28.9 million at the beginning of the quarter to a high of 53.2 million on December 15 before falling to 32.5 million at the end of the quarter.
- The share of CO<sub>2</sub> allowances that were held by compliance entities and their affiliates at the end of the fourth quarter of 2014 was 81 percent (out of approximately 403 million allowances in circulation). Approximately 66 percent of the allowances in circulation will be needed for second control period compliance.

### *Volume of CO<sub>2</sub> Allowance Transfers, Futures, and Options*

Figure 3 summarizes the volume of transfers of CO<sub>2</sub> allowances between the COATS accounts of unaffiliated firms and the volume of trading of RGGI futures listed on ICE. The figure also

shows the volume of transfers in the fourth quarter of 2014 compared to the previous quarter and to the fourth quarter of 2013.<sup>6</sup> The volumes of futures trading and CO<sub>2</sub> allowance transfers are shown separately according to whether the transaction involved allowances that were usable for compliance in the second control period.

**Figure 3: Volume of CO<sub>2</sub> Allowance Transfers Between Unaffiliated Parties<sup>7</sup>  
October 1, 2014 to December 31, 2014**



Key observations regarding the volume of transfers of CO<sub>2</sub> allowances in COATS between unaffiliated firms:

- CO<sub>2</sub> allowance trading increased significantly in the fourth quarter as compliance entities prepared for the end of the second control period. Compliance entities must acquire allowances for the second control period by the compliance deadline on March 2, 2015.

<sup>6</sup> Firms are categorized as affiliated based on available information. As a result, calculations provided in previous reports may be inconsistent with ones in this report when new information becomes available.

<sup>7</sup> Source: CO<sub>2</sub> allowance transfers are based on information in COATS.

- The total volume of CO<sub>2</sub> allowance transfers between unaffiliated firms was 41.6 million, up from 14.2 million allowances in the previous quarter and from 35.6 million allowances in the fourth quarter of 2013.
- Seventy-two percent of the volume of CO<sub>2</sub> allowance transfers between unaffiliated firms occurred in the last three trading days of each month, and 51 percent of the volume occurred in the last three trading days of 2014. Most of these transfers resulted from the final settlement of RGGI futures contracts.
- The share of CO<sub>2</sub> allowances that were held by compliance entities and their affiliates at the end of the fourth quarter of 2014 was 81 percent (out of approximately 403 million allowances in circulation). Approximately 66 percent of the allowances in circulation will be needed for second control period compliance, while the remainder will likely be banked for future control periods.

Key observations regarding the volume of trading of RGGI futures and options contracts:

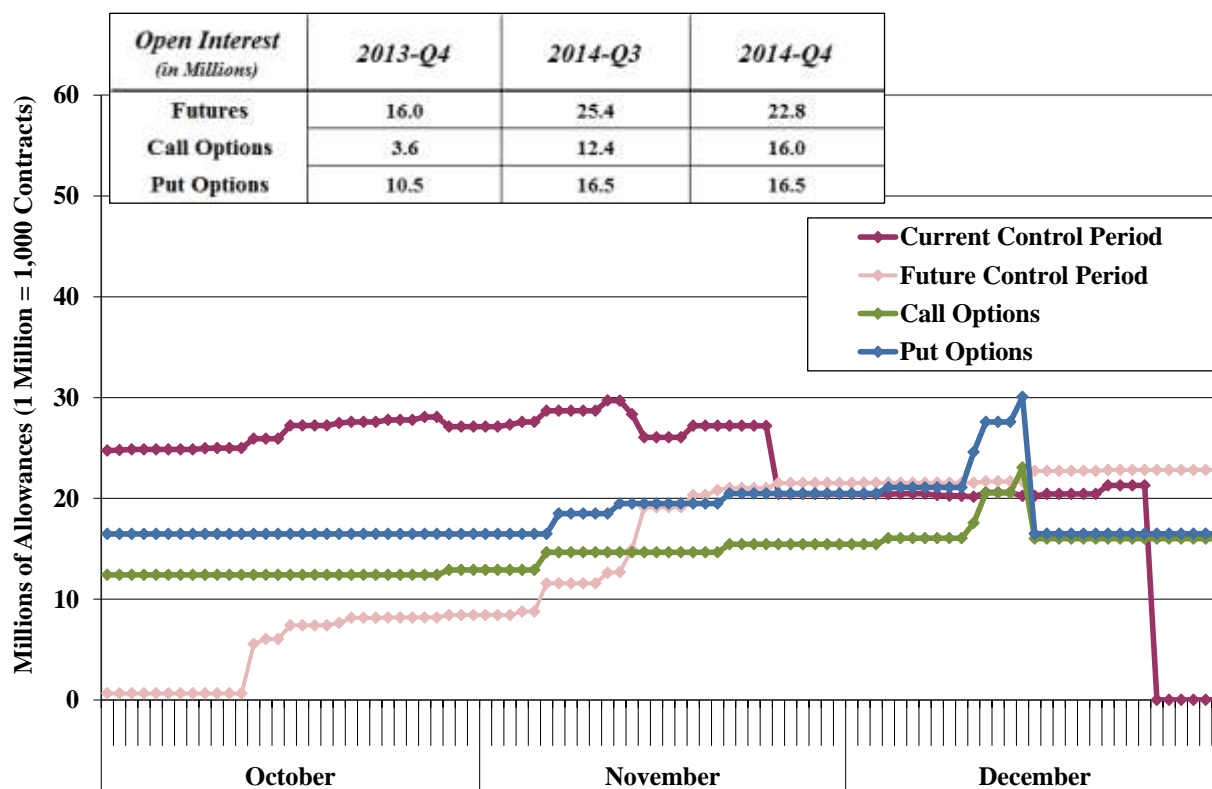
- Although the majority of trading volume was for contracts involving allowances usable for compliance in the second control period, trading of futures contracts for future control period allowances (i.e., vintages after 2014 and contracts expiring after the compliance deadline) increased dramatically in the fourth quarter of 2014.
- The total volume of trading of RGGI futures listed on ICE was 53.7 million CO<sub>2</sub> allowances in the fourth quarter of 2014, up from 11.2 million in the prior quarter and from 45.9 million in the fourth quarter of 2013.
- Approximately 55 percent of the volume of trading of RGGI futures listed on ICE during the fourth quarter of 2014 was for contracts that expired during the quarter. Thus, a large portion of the futures trading resulted in allowance transfers that were reflected in COATS by the end of the quarter. Nearly all of the remaining volume was for contracts that will expire in December 2015.
- There were 19 option trades reported on ICE in the fourth quarter of 2014, up from eight trades in the prior quarter.
- The total volume of options traded in the fourth quarter of 2014 was for 28 million CO<sub>2</sub> allowances, which was an increase from 5.6 million in the prior quarter.

### ***Open Interest in Exchange-Traded RGGI Futures and Options***

Figure 4 summarizes the level of open interest in exchange-traded futures and options listed on the ICE during the fourth quarter of 2014. The red line shows the level of open interest in futures contracts. As in Figure 3, the level of open interest in futures contracts for the first and second control period are shown together since all CO<sub>2</sub> allowances are essentially

interchangeable for compliance purposes. The green line shows the level of open interest in call options. The blue line shows the level of open interest in put options.

**Figure 4: Open Interest in RGGI Futures and Options  
October 1, 2014 to December 31, 2014**



Key observations regarding the level of open interest in RGGI futures and options:

- The total open interest in RGGI futures reached a high of 48.2 million on November 23, dropped to 42 million at the end of November, and dropped again to 22.8 million just before the end of the quarter.
- The decrease in levels of open interest in the current RGGI futures product on October 29, November 25, and December 29 were due to the settlement of contracts with expiration dates at the end of those months. The level of open interest in other RGGI futures products increased throughout the period as expected.
- The open interest in RGGI put options increased from 16.5 million at the end of the third quarter of 2014 to a high of 30.1 million on December 15, before dropping to 16.5 million at the end of the fourth quarter.



- The open interest in RGGI call options increased from approximately 12.4 million at the end of the third quarter of 2014 to over 23.1 million on December 15, before dropping to 16 million at the end of the fourth quarter.

### *Concentration of Open Interest*

Additional information about the trading of futures, forwards, and options is available in the weekly Commitments of Traders (“COT”) reports, which are published by the Commodity Futures Trading Commission (“CFTC”)<sup>8,9</sup> for each week when greater than 20 firms have reportable positions in a particular product.

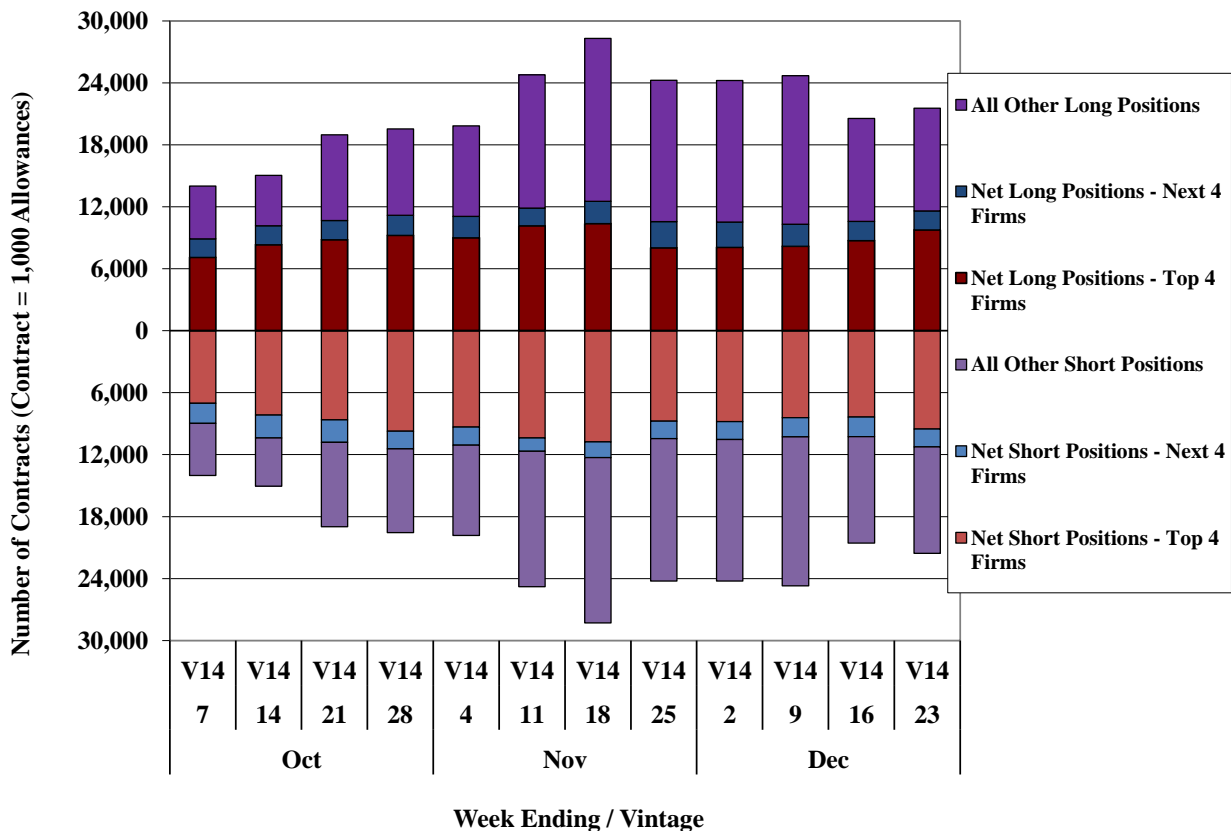
Figure 5 summarizes the concentration of open interest in 2014 vintage ICE futures and options contracts. The figure reports the net long positions in three categories: (i) the four firms with the largest long positions (see “Top 4 Firms”), (ii) the four firms with the largest long positions not including the Top 4 (see “Next 4 Firms”), and (iii) all other long positions. The figure also reports the net short positions in three categories: (i) the four firms with the largest short positions (see “Top 4 Firms”), (ii) the four firms with the largest short positions not including the Top 4 (see “Next 4 Firms”), and (iii) all other short positions.

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<sup>8</sup> Each day, firms with an open interest of 25 contracts or more are required to report their positions to the CFTC. The CFTC categorizes each firm as Commercial if it engages in trading primarily to supply its own need for allowances or Non-Commercial if it trades for another purpose. Hence, compliance entities are generally designated as Commercial and other entities are frequently designated as Non-Commercial. Each Tuesday, the CFTC issues the COT report, which is a summary of the long and short positions of participants in the market.

<sup>9</sup> The CFTC does not publish information from the COT reports for weeks when fewer than 20 firms have reportable positions in a given product, which is why no information is shown for any vintage contract other than 2014 (each vintage is reported separately).

Figure 5: Concentration of Open Interest in CCFE Futures and Options<sup>10</sup>  
October 1 to December 31, 2014



Observations regarding the concentration of open interest:

- Many firms have open interest in RGGI CO<sub>2</sub> allowance futures and options, although a small number of firms account for large shares of the net long and short positions in 2014 vintage contracts.
  - ✓ The “Top Four” Firms accounted for an average of 43 percent of the total long positions for the weeks shown during the quarter, while 52 percent of the total long positions were held by eight firms.
  - ✓ The “Top Four” Firms accounted for an average of 43 percent of the total short positions for the weeks shown during the quarter, while 52 percent of the total short positions were held by eight firms.
- The CFTC does not publish firm-level information on open interest, although the information they publish provides an indication of the upper limits of the net long and net short positions of individual firms. Combined with firm-specific information about CO<sub>2</sub> allowance holdings

<sup>10</sup> Source: The CFTC’s Commitment of Traders reports which are available at “[www.cftc.gov/MarketReports/CommitmentsofTraders/HistoricalCompressed/index.htm](http://www.cftc.gov/MarketReports/CommitmentsofTraders/HistoricalCompressed/index.htm)”.

from COATS, the information on open interest that is published by the CFTC is useful for evaluating the potential for a firm to hoard RGGI CO<sub>2</sub> allowances, which is discussed further in Section E.

## E. DISCUSSION OF MARKET MONITORING

As the RGGI Market Monitor, we monitor trading in the secondary CO<sub>2</sub> allowance market in order to identify anticompetitive conduct. Additionally, the Commodity Futures Trading Commission (“CFTC”) evaluates trading in the secondary CO<sub>2</sub> allowance market consistent with its role as the regulator of derivative markets in the U.S. This section discusses two types of anti-competitive conduct for which we monitor. As in previous reports on the secondary market, we find no evidence of anti-competitive conduct.

In any commodity market, one potential concern is that a firm could hoard a substantial share of the supply of a commodity to influence prices or to prevent a competitor from obtaining CO<sub>2</sub> allowances. Hence, we screen information on the holdings of CO<sub>2</sub> allowances and allowance-derivatives and the demand for allowances to identify firms that might acquire a position that raises competitive concerns. During the first control period, hoarding was not a significant concern for the RGGI CO<sub>2</sub> allowance market because the amount of allowances that were available through the auctions was more than sufficient to satisfy the demand for allowances. During the second control period, which began in January 2012, the ability of an individual firm to hoard is limited by the substantial private bank of CO<sub>2</sub> allowances that has been accumulated and also by the market rules, particularly the auction rules that limit the amount of allowances that can be purchased by a single party or group of affiliated parties in a single offering to 25 percent.

Another potential concern is that a firm expecting to purchase CO<sub>2</sub> allowances in the auction might sell a large number of futures contracts in an effort to push the price of the contracts below the competitive level. Such a firm might profit from buying a large number of CO<sub>2</sub> allowances in the auction at a discount if the bidding in the auction were influenced by the depressed futures price. For this to be a profitable strategy, the firm would need to be able to substantially depress the futures price with a relatively small amount of sales—an amount smaller than the amount of CO<sub>2</sub> allowances it planned to buy in the auction. The best protection against this strategy is a market where other firms respond by making additional purchases. Firms that are looking for an opportunity to reduce their short positions or to purchase CO<sub>2</sub> allowances for their future

compliance needs help limit the effectiveness of a strategy to depress prices below the competitive level. Nevertheless, the CFTC has access to confidential transaction data, which allows it to monitor for evidence of manipulative conduct.