

MARKET MONITOR REPORT FOR AUCTION 24

Prepared for:

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

Prepared By:



June 6, 2014



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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 24

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 World Energy Solutions. This report summarizes our findings regarding RGGI Auction 24, which was held on June 4, 2014.

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.

Forty-three bidders participated in the offering of CO₂ allowances. Bids were submitted to purchase 2.9 times the available supply of allowances, resulting in a clearing price of \$5.02 per ton. Compliance entities or their affiliates purchased 55 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 24 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 17 percent of the total projected demand for allowances. Approximately 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.

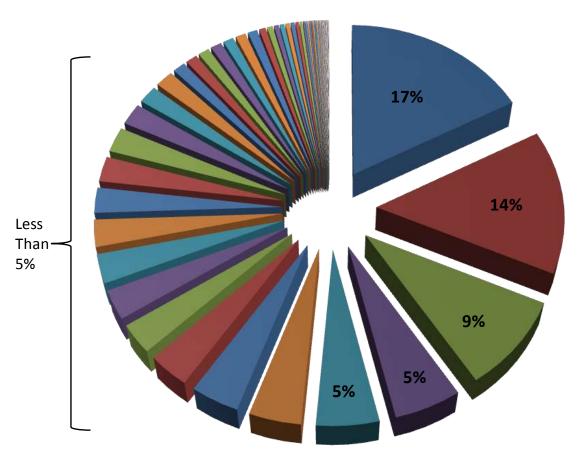


Figure 1: Projected Demand for RGGI Allowances Shares by Compliance Entity



B. DISPERSION OF BIDS IN AUCTION 24

In the offering of allowances for the current control period, bids were submitted by 37 compliance entities and six 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. Seven compliance entities and three other entities submitted bids for a large quantity of allowances (i.e., at least 2 million tons). Overall, compliance entities accounted for 72 percent of the quantity of allowances for which bids were submitted. The quantity of allowances for which bids were submitted was 2.9 times the Initial Offering of 18,062,384 allowances. In Auction 23, the quantity of allowances for which bids were submitted was 3.1 times the Initial Offering of 18,491,350 allowances and 2.5 times the total available supply (including the 5 million allowances in the cost containment reserve ("CCR")).

The bid quantities were widely distributed among the 43 bidders. The concentration of bids, using the Herfindahl-Hirschman Index ("HHI"), is relatively low at 536, 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 (hence, the index ranges from 0 to 10,000).



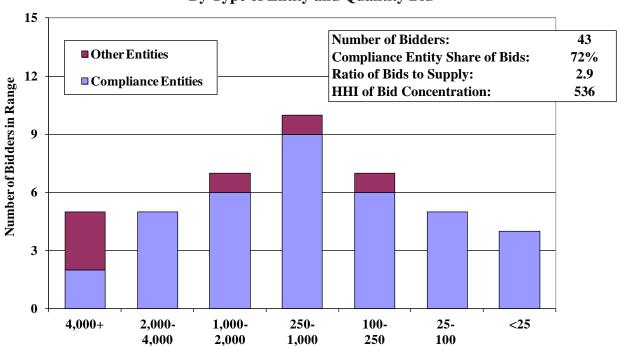


Figure 2: Quantity of Bids Submitted by Entity By Type of Entity and Quantity Bid

 $Quantity \ of \ Bids \ Submitted \ (in \ Thousands \ of \ Tons)$



C. SUMMARY OF PURCHASES OF ALLOWANCES IN AUCTION 24

In the offering of allowances for the current control period, awards were distributed across 30 bidders with three bidders purchasing two million tons or more and 12 bidders purchasing 300,000 tons or more. Compliance entities or their affiliates purchased 55 percent of the allowances in the auction.

The share of allowances purchased and several other quantities are reported for two types of entities:

- Compliance Entities: This includes all compliance entities and their affiliates. In this report, affiliated firms are 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.
- Other Entities: This includes all other entities without compliance obligations.

The following statistics summarize the purchases and holdings of allowances by compliance entities and their affiliates under the RGGI program:

- In Auction 24, compliance entities and their affiliates purchased 55 percent of the allowances sold.
- In the first 24 RGGI auctions, compliance entities and their affiliates purchased 78 percent of the allowances sold.
- Compliance entities and their affiliates will hold 77 percent of the allowances in circulation following the settlement of allowances sold in Auction 24.

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	4,150,000
Bidder 2	2,400,000
Bidder 3	2,100,000
Bidder 4	1,400,000
Bidder 5	1,267,384
Bidder 6	1,250,000
Bidder 7	1,195,000
Bidder 8	616,000
Bidder 9	600,000
Bidder 10	565,000
Bidder 11	524,000
Bidder 12	464,000
Bidder 13	200,000
Bidder 14	160,000
Bidder 15	150,000
Bidder 16	150,000
Bidder 17	147,000
Bidder 18	144,000
Bidder 19	127,000
Bidder 20	98,000
Bidder 21	95,000
Bidder 22	50,000
Bidder 23	50,000
Bidder 24	40,000
Bidder 25	40,000
Bidder 26	25,000
Bidder 27	20,000
Bidder 28	18,000
Bidder 29	10,000
Bidder 30	7,000



D. SUMMARY OF BID PRICES IN AUCTION 24

Bids were submitted across a wide range of prices in the auction and the clearing price of \$5.02 was relatively consistent with average bid prices submitted.

The following table reports several statistics regarding the bid prices for bids submitted in Auction 24. The median and mean bid prices are weighted by the quantity of each bid.

Bid Prices:	
Minimum	\$2.00
Maximum	\$19.27
Average (Median)	\$4.83
Average (Mean)	\$4.95
Clearing Price:	\$5.02



E. NAMES OF POTENTIAL BIDDERS IN AUCTION 24

In accordance with Sections 2.8 and 3 of the Auction Notice for CO₂ Allowance Auction 24 on June 4, 2014, the Participating States are releasing the names of Potential Bidders in Auction 24. The states defined potential bidders as: "Each Applicant that has been qualified and submitted a complete *Intent to Bid.*" The list of 51 Potential Bidders is as follows:

Astoria Energy, LLC

Brayton Point Energy, LLC

Brooklyn Navy Yard Cogen Partners, LP

Caithness Long Island, LLC Calpine Energy Services, LP

Castleton Commodities Merchant Trading, LP

Castleton Power, LLC CE2 Carbon Capital, LLC

Consolidated Edison Comp. of NY, Inc. Delaware City Refining Company, LLC Dominion Energy Marketing, Inc. EDF Trading North America, LLC Emera Energy Generation II, LLC

Entergy Rhode Island State Energy, LP

EquiPower Resources Essential Power, LLC

Exelon Generation Company, LLC GDF SUEZ Energy Marketing NA, Inc.

GenOn Energy Management, LLC Granite Ridge Energy, LLC

Hess Energy Marketing, LLC Indeck-Corinth Limited Partnership Indeck-Olean Limited Partnership Indeck-Oswego Limited Partnership Indeck-Yerkes Limited Partnership Jamestown Board of Public Utilities J-Power USA Development Co., Ltd.

Kleen Energy Systems, LLC Koch Supply & Trading, LP Lakeside Energy, LLC

Luminus Energy Partners QP, LP

Massachusetts Water Resources Authority

Mercuria Energy America, Inc.
Millennium Power Partners, LP
Morgan Stanley Capital Group, Inc.
National Grid Gen. dba National Grid
New Athens Generating Company, LLC
NextEra Energy Power Marketing, LLC

NRG Power Marketing, LLC

Power Authority of the State of New York PSEG Energy Resources & Trade, LLC Public Service Company of New Hampshire

RBC

Selkirk Cogen Partners, LP

Shell Energy North America (US), LP TransCanada Power Marketing, Ltd. Twin Eagle Resource Management, LLC Upstate New York Power Producers, LLC

Verso Paper Corp.
Village of Freeport

Vitol Inc.