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CO₂ Allowances Sold for \$5.35 in 42nd RGGI Auction

\$71.5 Million Raised for Reinvestment in Final Auction of 2018

NEW YORK — The nine New England and Mid-Atlantic states participating in the Regional Greenhouse Gas Initiative (RGGI), the nation's first market-based regulatory program to reduce greenhouse gas (GHG) pollution, today announced the results of their 42^{nd} auction of carbon dioxide (CO₂) allowances.

13,360,649 CO₂ allowances were sold at the auction at a clearing price of \$5.35. Bids for the CO₂ allowances ranged from \$2.20 to \$7.50 per allowance. Additional details are available in the <u>Market Monitor Report for Auction 42</u>, which is also appended.

The auction generated \$71.5 million for reinvestment in strategic programs, including energy efficiency, renewable energy, direct bill assistance, and GHG abatement programs.

Ten million cost containment reserve (CCR) allowances were also available for sale. None of the CCR allowances were sold. The CCR is a fixed additional supply of allowances that are only available for sale if CO₂ allowance prices exceed certain price levels (\$10.25 in 2018).

"With Auction 42, the RGGI states conclude the final auction of 2018, a year of steady bipartisan environmental progress," said Ben Grumbles, Secretary of the Maryland Department of the Environment and Chair of the RGGI, Inc. Board of Directors. "This auction also follows the latest report on the investment of RGGI proceeds, which showed continuing benefits. State-specific programs funded through RGGI proceeds have supported such diverse outcomes as weatherizing homes, incentivizing the purchase of electric vehicles, and installing highly efficient combined heat and power."

"It's no surprise that new states are showing interest in participating in our market-based program," said Katie Dykes, Chair of the Connecticut Public Utilities Regulatory Authority and Vice Chair of the RGGI, Inc. Board of Directors. "The conclusion of another successful auction builds on a now decade-long track record of auctioning, reinvestment, and ambitious emissions reductions."

Auction 42 Results At-A-Glance		
Auction Date	Dec. 5, 2018	
Allowances Offered for Sale	13,360,649	
Allowances Sold	13,360,649	
Ratio of Bids to Supply	2.8	
Clearing Price	\$5.35	
Reserve Price	\$2.20	
Proceeds from Auction 42	\$71,479,472.15	
Total Cumulative Proceeds (All Auctions)	\$3,075,228,542.17	
Number of Bidders in Auction 42	48	
Percent of Allowances Purchased by Compliance- Oriented Entities in Auction 42	69%	
Percent of Allowances Purchased by Compliance Entities in Auction 42	77%	
Percent of Allowances Purchased by Compliance Entities in Auctions 1 - 42	74%	

More auction data is also available at: <u>https://www.rggi.org/auctions/auction-results</u>. Market monitor reports are available at: <u>https://www.rggi.org/auctions/market-monitor-reports</u>. To receive announcements relating to future auctions and other RGGI news, please join the RGGI, Inc. mailing list at <u>http://eepurl.com/h2ICM</u>.

About the Regional Greenhouse Gas Initiative (RGGI)

The New England and Mid-Atlantic states participating in the fourth RGGI control period (Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont) have implemented the first mandatory market-based regulatory program in the U.S. to reduce greenhouse gas emissions. The 2018 RGGI cap is 82.2 million short tons. The RGGI states also include interim adjustments to the RGGI cap to account for banked CO₂ allowances. The 2018 RGGI adjusted cap is 60.3 million short tons.

RGGI is composed of individual CO₂ budget trading programs in each state, based on each state's independent legal authority. A CO₂ allowance represents a limited authorization to emit one short ton of CO₂, as issued by a respective state. A regulated power plant must hold CO₂ allowances equal to its emissions for each three-year control period. RGGI's fourth control period began on January 1, 2018 and extends through December 31, 2020. For more information visit www.rggi.org

About Regional Greenhouse Gas Initiative, Inc.

Regional Greenhouse Gas Initiative, Inc. (RGGI, Inc.) was created to provide technical and administrative services to the states participating in the Regional Greenhouse Gas Initiative. RGGI, Inc. is a 501(c)(3) nonprofit organization. For more information, visit: www.rggi.org/rggi-inc/contact



MARKET MONITOR REPORT FOR AUCTION 42

Prepared for:

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

Prepared By:



December 7, 2018



This report was prepared by Potomac Economics (the contractor) in the course of performing work contracted for and sponsored by RGGI, Inc. on behalf of states participating in RGGI (Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont). The opinions expressed in this report do not necessarily reflect those of RGGI, Inc. or any of the states participating in RGGI, and reference to any specific product, service, process, or method does not constitute an implied or expressed recommendation or endorsement of it. Further, RGGI, Inc., the states participating in RGGI, and the contractor make no warranties or representations, expressed or implied, as to the fitness for particular purpose or merchantability of any product, apparatus, or service, or the usefulness, completeness, or accuracy of any processes, methods, or other information contained, described, disclosed, or referred to in this report. RGGI, Inc., the states participating in RGGI, and the contractor make no representation that the use of any product, apparatus, process, method, or other information will not infringe privately owned rights and will assume no liability for any loss, injury, or damage resulting from, or occurring in connection with, the use of information contained, described, disclosed, or referred to in this report.

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 42

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. This report summarizes our findings regarding RGGI Auction 42, which was held on December 5, 2018.

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-eight bidders participated in the offering of CO₂ allowances. Bids were submitted to purchase 2.8 times the available supply of allowances, resulting in a clearing price of \$5.35 per ton. Compliance-Oriented Entities purchased 69 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 42 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 11 percent of the total projected demand for allowances. Over 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.

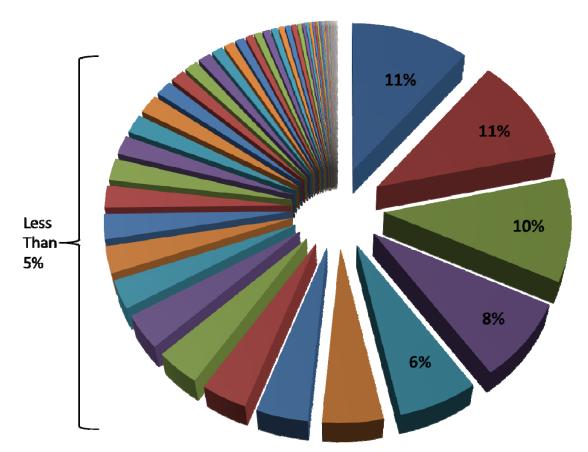


Figure 1: Projected Demand for RGGI Allowances Shares by Compliance Entity



B. SUMMARY OF PURCHASES OF ALLOWANCES IN AUCTION 42

Awards were distributed across 41 bidders with four bidders purchasing one million tons or more and 17 bidders purchasing 200,000 tons or more.

This report summarizes participation in Auction 42. Participation in the RGGI market involves many different firms with various interests in RGGI allowances. Some participate in order to satisfy compliance obligations, others have investment interests, and still others participate for both purposes. To more effectively track the activity of different participants, we use several classifications for participant firms. Figure 2 summarizes the relationship between these classifications.

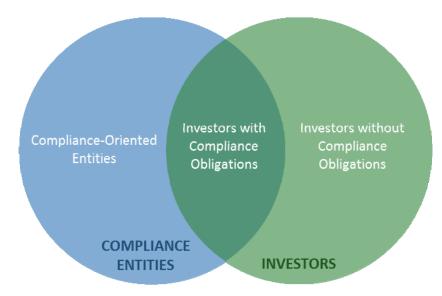


Figure 2: Classifications of Participant Firms in the RGGI Marketplace

- *Compliance-Oriented Entities* are compliance entities that appear to acquire and hold allowances primarily to satisfy their compliance obligations.
- *Investors with Compliance Obligations* are firms that have compliance obligations but which hold a number of allowances that exceeds their estimated compliance obligations by a margin suggesting they also buy for re-sale or some other investment purpose. These firms often transfer significant quantities of allowances to unaffiliated firms.¹

¹ 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, (b) the total number of allowances in circulation, and (c) consideration of the pattern of the entity's allowance transfers to unaffiliated firms versus affiliated firms. Since the designation of a compliance entity as an investor is based on a review of its transactions and holdings, the designation of a particular firm may change



• Investors without Compliance Obligations are firms without any compliance obligations.

These three categories form the basis for two overlapping groups.

- *Compliance Entities* All firms with compliance obligations, and their affiliates.² Combines the first and second of the above categories.
- *Investors* All firms which are assessed to be purchasing for investment rather than compliance purposes. Combines the second and third of the above categories.

In Auction 42, Compliance Entities purchased 77 percent of the allowances sold. In the first 42 RGGI auctions, Compliance Entities purchased 74 percent of the allowances sold. In Auction 42, Compliance-Oriented Entities purchased 69 percent of the allowances sold.

After settlement of allowances sold in Auction 42:

- Forty-three percent of the allowances in circulation will be held by Compliance-Oriented Entities.
- Fifty 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 Investors with Compliance Obligations.

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.

over time as more information becomes available.

² Affiliates 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.

Bidder	Number of Allowances Awardee
Bidder 1	2,500,000
Bidder 2	2,000,000
Bidder 3	1,000,000
Bidder 4	1,000,000
Bidder 5	739,000
Bidder 6	700,000
Bidder 7	608,000
Bidder 8	521,000
Bidder 9	500,000
Bidder 10	500,000
Bidder 11	400,000
Bidder 12	397,000
Bidder 13	250,000
Bidder 14	250,000
Bidder 15	250,000
Bidder 16	225,000
Bidder 17	200,000
Bidder 18	196,649
Bidder 19	145,000
Bidder 20	145,000
Bidder 21	125,000
Bidder 22	125,000
Bidder 23	100,000
Bidder 24	80,000
Bidder 25	54,000
Bidder 26	38,000
Bidder 27	35,000
Bidder 28	32,000
Bidder 29	31,000
Bidder 30	30,000
Bidder 31	30,000
Bidder 32	27,000
Bidder 33	27,000
Bidder 34	26,000
Bidder 35	26,000
Bidder 36	24,000
Bidder 37	11,000
Bidder 38 Bidder 39	9,000 2,000
Bidder 39 Bidder 40	2,000
Bidder 40 Bidder 41	1,000

Table 1: Quantity of Allowances Awarded by Bidder



C. DISPERSION OF BIDS IN AUCTION 42

Bids were submitted by 31 Compliance-Oriented Entities and 17 Investors. 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. Three Compliance-Oriented Entities and six Investors submitted bids for a large quantity of allowances (i.e., at least 2 million tons). Overall, Compliance-Oriented Entities accounted for 37 percent of the quantity of allowances for which bids were submitted. The quantity of allowances for which bids were submitted was 2.8 times the available supply. In Auction 41, the quantity of allowances for which bids were submitted was 3.2 times the Initial Offering.

The bid quantities were widely distributed among the 48 bidders. The concentration of bids, using the Herfindahl-Hirschman Index ("HHI"), is relatively low at 617, 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).

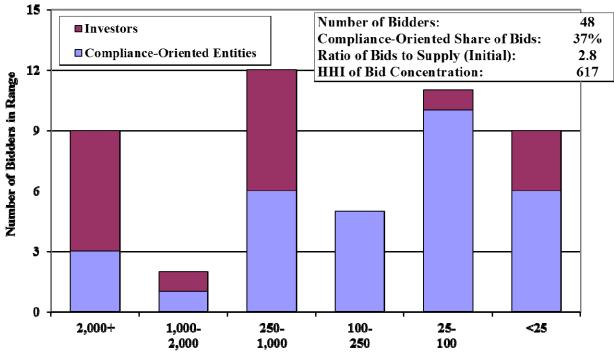


Figure 3: Quantity of Bids Submitted by Entity By Type of Entity and Quantity Bid

Quantity of Bids Submitted (in Thousands of Tons)



D. SUMMARY OF BID PRICES IN AUCTION 42

Bids were submitted across a wide range of prices in the auction and the clearing price of \$5.35 was relatively consistent with average bid prices submitted.

The following table reports several statistics regarding the bid prices for bids submitted in Auction 42. The median and mean bid prices are weighted by the quantity of each bid.

Bid Prices:	
Minimum	\$2.20
Maximum	\$7.50
Average (Median)	\$5.26
Average (Mean)	\$5.21
Clearing Price:	\$5.35



E. NAMES OF POTENTIAL BIDDERS IN AUCTION 42

In accordance with Sections 2.8 and 3 of the Auction Notice for CO₂ Allowance Auction 42, the Participating States are releasing the names of Potential Bidders in Auction 42. The states defined potential bidders as: "Each Applicant that has been qualified and submitted a complete *Intent to Bid.*" The list of 54 Potential Bidders is as follows:

Astoria Energy, LLC Blue Delta Energy, LLC BP Products North America Inc. Brooklyn Navy Yard Cogen Partners, LP Caithness Long Island, LLC Carbon Lighthouse Association Consolidated Edison Comp. of NY, Inc. CPV Maryland, LLC CPV Towantic, LLC CPV Valley, LLC Delaware City Refining Company, LLC Dennis Sullivan Direct Energy Business Marketing, LLC DTE Energy Trading, Inc. Edgewood Energy, LLC Element Markets, LLC Equus Power I, LP Exelon Generation Company, LLC Footprint Power Salem Harbor Development, LP Gen IV Investment Opportunities, LLC Hawkeye Energy Greenport Indeck-Corinth Limited Partnership Indeck-Oswego Limited Partnership Indeck-Yerkes Limited Partnership Jamestown Board of Public Utilities Kendall Green Energy, LLC KMC Thermo, LLC

Koch Supply & Trading, LP Luminus Energy Partners Master Fund, Ltd. Macquarie Energy, LLC Massachusetts Muni. Wholesale Elec. Co. Mercuria Energy America, Inc. Morgan Stanley Capital Group, Inc. National Grid Gen. dba National Grid Nautilus Power, LLC NextEra Energy Marketing, LLC NRG Power Marketing, LLC Old Dominion Electric Cooperative Pinelawn Power, LLC Power Authority of the State of New York PSEG Energy Resources & Trade, LLC RBC Rhode Island State Energy Center, LP Selkirk Cogen Partners, LP Shell Energy North America (US), LP Shoreham Energy, LLC Statkraft US, LLC Taunton Municipal Lighting Plant Tenaska Power Services Co. Tenaska, Inc. Verso Corporation Village of Freeport Vitol Inc. Wallingford Energy, LLC