

Contact: info@rggi.org

Friday, September 4, 2020

CO₂ Allowances Sold for \$6.82 in 49th RGGI Auction

\$110.4 Million Raised for Reinvestment in Third Auction of 2020

NEW YORK — The ten participating states 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 49th auction of carbon dioxide (CO₂) allowances.

16,192,785 CO₂ allowances were sold at the auction at a clearing price of \$6.82. Bids for the CO₂ allowances ranged from \$2.32 to \$10.00 per allowance. Additional details are available in the *Market Monitor Report for Auction 49*, which is appended.

The auction generated \$110.4 million for states to reinvest in strategic programs, including energy efficiency, renewable energy, direct bill assistance, and GHG abatement programs.

11.8 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 made available for sale if CO_2 allowance prices exceed certain price levels (\$10.77 in 2020).

"Our 49th successful regional auction demonstrates RGGI's continued stability and effectiveness," said Martin Suuberg, Commissioner of the Massachusetts Department of Environmental Protection and Chair of the RGGI, Inc. Board of Directors. "Throughout a challenging year, RGGI's resilience has been demonstrated by the smooth operation of our regional auctions, along with the continued investment of proceeds. Historically, these investments have saved consumers billions on their energy bills while lowering carbon emissions – two critical aspects of RGGI's success."

"The ten RGGI participating states share a strong commitment to fighting climate change," said Ben Grumbles, Secretary of the Maryland Department of the Environment and Vice Chair of the RGGI, Inc. Board of Directors. "RGGI's market-based, bipartisan approach helps participating states support each other toward their individual climate goals, while strengthening the regional economy through investments in clean energy."

Auction 49 Results At-A-Glance		
Auction Date	September 2, 2020	
Allowances Offered for Sale	16,192,785	
Allowances Sold	16,192,785	
Ratio of Bids to Supply	2.6x	
Clearing Price	\$6.82	
Reserve Price	\$2.32	

Proceeds from Auction 49	\$110,434,793.70
Total Cumulative Proceeds (All Auctions)	\$3,655,163,258.74
Number of Bidders in Auction 49	55
Percent of Allowances Purchased by Compliance- Oriented Entities in Auction 49	66%
Percent of Allowances Purchased by Compliance Entities in Auction 49	74%
Percent of Allowances Purchased by Compliance Entities in Auctions 1 - 49	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 Jersey, 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 2020 RGGI cap is 96.2 million short tons. The RGGI states also include interim adjustments to the RGGI cap to account for banked CO₂ allowances. The 2020 RGGI adjusted cap is 74.3 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 the Regional Greenhouse Gas Initiative, Inc.

The 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: <u>www.rggi.org/rggi-inc/contact</u>.



MARKET MONITOR REPORT FOR AUCTION 49

Prepared for:

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

Prepared By:



September 4, 2020



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 Jersey, 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, disclosed, or referred to in this report 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 New England and Mid-Atlantic states to reduce emissions of carbon dioxide (CO_2) 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 49

As the Market Monitor for the RGGI CO_2 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 allowance auctions by Enel X. This report summarizes our findings regarding RGGI Auction 49, which was held on September 2, 2020.

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.

Fifty-five bidders participated in the offering of CO_2 allowances. Bids were submitted to purchase 2.6 times the available supply of allowances, resulting in a clearing price of \$6.82 per ton. Compliance-Oriented Entities purchased 66 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 49 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 CO_2 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 demand for CO_2 allowances is based on the requirement for each compliance entity in the RGGI footprint to obtain one CO_2 allowance for each short ton of CO_2 that it emits from the sale of electricity. The following figure shows the relative shares of projected demand for RGGI allowances by compliance entity. The largest compliance entity represents only 12 percent of the total projected demand for allowances. Nearly half of the projected demand is composed of entities that each account for less than 4 percent of the total demand. Participation by a large number of entities facilitates the competitive performance of the auction.

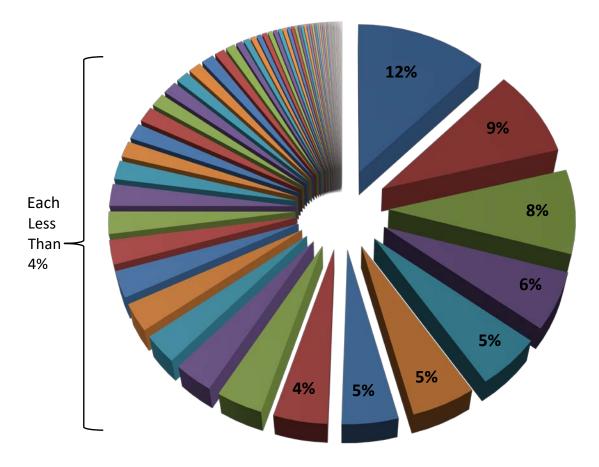


Figure 1: Projected Demand for RGGI Allowances Shares by Compliance Entity



B. SUMMARY OF PURCHASES OF ALLOWANCES IN AUCTION 49

Awards were distributed across 34 bidders with six bidders purchasing one million tons or more and 19 bidders purchasing 200,000 tons or more.

This report summarizes participation in Auction 49. 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.

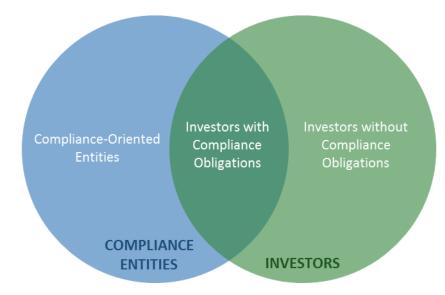


Figure 2: Classifications of Participant Firms in the RGGI Marketplace

- *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 2026, (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 over time as more information becomes available.



• 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 obligations² and their affiliates.³ 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 49, Compliance Entities purchased 74 percent of the allowances sold. In the first 49 RGGI auctions, Compliance Entities purchased 74 percent of the allowances sold. In Auction 49, Compliance-Oriented Entities purchased 66 percent of the allowances sold.

After settlement of allowances sold in Auction 49:

- Fifty-one percent of the allowances in circulation will be held by Compliance-Oriented Entities.
- Fifty-eight 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.

² The Virginia governor has signed legislation providing for it to begin participating in RGGI beginning January 2021. Since this occurred, firms owning Budget Sources in Virginia have been treated as compliance entities in our reports.

³ 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.

Number of Allowances	
Bidder	Awarded
Bidder 1	2,805,785
Bidder 2	1,500,000
Bidder 3	1,348,000
Bidder 4	1,078,000
Bidder 5	1,000,000
Bidder 6	1,000,000
Bidder 7	872,000
Bidder 8	865,000
Bidder 9	800,000
Bidder 10	750,000
Bidder 11	500,000
Bidder 12	475,000
Bidder 13	460,000
Bidder 14	428,000
Bidder 15	400,000
Bidder 16	363,000
Bidder 17	300,000
Bidder 18	250,000
Bidder 19	200,000
Bidder 20	142,000
Bidder 21	124,000
Bidder 22	97,000
Bidder 23	95,000
Bidder 24	80,000
Bidder 25	61,000
Bidder 26	50,000
Bidder 27	39,000
Bidder 28	25,000
Bidder 29	25,000
Bidder 30	24,000
Bidder 31	19,000
Bidder 32	10,000
Bidder 33	4,000
Bidder 34	3,000

Table 1: Quantity of Allowances Awarded by Bidder



C. DISPERSION OF BIDS IN AUCTION 49

Bids were submitted by 43 Compliance-Oriented Entities and 12 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. Nine Compliance-Oriented Entities and seven Investors submitted bids for a large quantity of allowances (i.e., at least 1 million tons). Overall, Compliance-Oriented Entities accounted for 55 percent of the quantity of allowances for which bids were submitted. The quantity of allowances for which bids were submitted was 2.6 times the Initial Offering. In the previous auction, the quantity of allowances for which bids were submitted was 2.0 times the Initial Offering.

The bid quantities were widely distributed among the 55 bidders. The concentration of bids, using the Herfindahl-Hirschman Index ("HHI"), was relatively low at 523, somewhat higher than in recent auctions. The HHI is a standard measure of concentration calculated by squaring each entity's percent share and then summing the squares across all entities (i.e., the index ranges from 0 to 10,000).

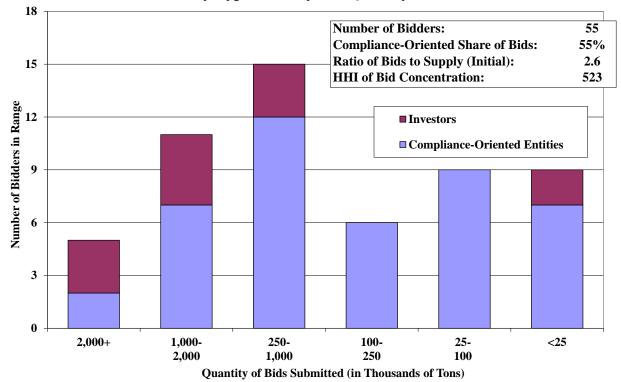


Figure 3: Quantity of Bids Submitted by Entity By Type of Entity and Quantity Bid

D. SUMMARY OF BID PRICES IN AUCTION 49

Bids were submitted across a wide range of prices in the auction and the clearing price of \$6.82 was relatively consistent with average bid prices submitted.

The following table reports several statistics regarding the bid prices for bids submitted in Auction 49. The median and mean bid prices are weighted by the quantity of each bid.

Bid Prices:	
Minimum	\$2.32
Maximum	\$10.00
Average (Median)	\$6.72
Average (Mean)	\$6.67
Clearing Price:	\$6.82



E. NAMES OF POTENTIAL BIDDERS IN AUCTION 49

In accordance with Sections 2.8 and 3 of the Auction Notice for CO₂ Allowance Auction 49, the Participating States are releasing the names of Potential Bidders in Auction 49. The states defined potential bidders as: "Each Applicant that has been qualified and submitted a complete *Intent to Bid.*" The list of 63 Potential Bidders is as follows:

Astoria Energy, LLC Blue Delta Energy, LLC BP Products North America Inc. Caithness Long Island, LLC Calpine Energy Services, LP Carbon Lighthouse Association Castleton Commodities Merchant Trading, LP City of Vineland Clay Hills Management Ltd. Consolidated Edison Comp. of NY, Inc. CPV Maryland, LLC CPV Shore, LLC CPV Towantic, LLC CPV Valley, LLC Cricket Valley Energy Center, LLC Delaware City Refining Company, LLC Dighton Power, LLC DTE Energy Trading, Inc. Dynegy Marketing and Trade, LLC ECP Capital LP Edgewood Energy, LLC Empire Generating Co., LLC Equus Power I, LP Exelon Generation Company, LLC Footprint Power Salem Harbor Development LP Hawkeye Energy Greenport Indeck Energy Serv. of Silver Springs Indeck-Corinth Limited Partnership Indeck-Olean Limited Partnership Indeck-Yerkes Limited Partnership Jamestown Board of Public Utilities Kendall Green Energy LLC

KMC Thermo, LLC Koch Supply & Trading, LP Luminus Capital Partners Master Fund LP Macquarie Energy, LLC Mercuria Energy America, LLC Morgan Stanley Capital Group, Inc. National Grid Generation LLC dba National Grid Nautilus Power, LLC NextEra Energy Marketing, LLC NRG Power Marketing LLC Old Dominion Electric Cooperative Pacific Investment Management Company LLC **PCAFILLC** Pinelawn Power, LLC Pixelle Androscoggin LLC Power Authority of the State of New York PSEG Energy Resources & Trade LLC RBC Revere Power, LLC 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. Village of Freeport Virginia Electric and Power Company Vitol Inc. Wallingford Energy, LLC