MARKET MONITOR REPORT
FOR AUCTION 54

Prepared for:
RGGI, Inc., on behalf of the RGGI Participating States

Prepared By:

December 3, 2021
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, Vermont, and Virginia). 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 initiative 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 (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 54

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 allowance auctions by Enel X. This report summarizes our findings regarding RGGI Auction 54, which was held on December 1, 2021.

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.

Sixty-seven bidders participated in the auction for CO2 allowances. Bids were submitted to purchase 2.5 times the initial offering of approximately 23.1 million allowances. However, the quantity for which bids were submitted above $13.00 per ton exceeded the initial offering, so the Cost Containment Reserve (“CRR”) was made available at the CCR Trigger Price of $13.00 per ton. Over 3.9 million additional allowances were sold, resulting in partial depletion of the CCR for 2021 and a clearing price of $13.00 per ton in the auction. Compliance-Oriented Entities purchased 67 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 54 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 demand for CO2 allowances is based on the requirement for each compliance entity in the RGGI footprint to obtain one CO2 allowance for each short ton of CO2 that it emits from the sale of electricity. The following figure shows the relative shares of projected demand for RGGI allowances by compliance entity in the fifth control period. The largest compliance entity represents 18 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 54

Awards were distributed across 53 bidders with five bidders purchasing one million tons or more and 28 bidders purchasing 200,000 tons or more.

This report summarizes participation in Auction 54. 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 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 54, Compliance Entities purchased 68 percent of the allowances sold. In the first 54 RGGI auctions, Compliance Entities purchased 73 percent of the allowances sold. In Auction 54, Compliance-Oriented Entities purchased 67 percent of the allowances sold.

After settlement of allowances sold in Auction 54:

• Forty-five 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.

---

\(^2\) 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.
Table 1: Quantity of Allowances Awarded by Bidder

<table>
<thead>
<tr>
<th>Bidder</th>
<th>Number of Allowances Awarded</th>
<th>Bidder</th>
<th>Number of Allowances</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bidder 1</td>
<td>5,780,000</td>
<td>Bidder 35</td>
<td>88,000</td>
</tr>
<tr>
<td>Bidder 2</td>
<td>4,869,000</td>
<td>Bidder 36</td>
<td>85,000</td>
</tr>
<tr>
<td>Bidder 3</td>
<td>3,450,000</td>
<td>Bidder 37</td>
<td>75,000</td>
</tr>
<tr>
<td>Bidder 4</td>
<td>1,212,000</td>
<td>Bidder 38</td>
<td>75,000</td>
</tr>
<tr>
<td>Bidder 5</td>
<td>1,120,000</td>
<td>Bidder 39</td>
<td>69,000</td>
</tr>
<tr>
<td>Bidder 6</td>
<td>764,000</td>
<td>Bidder 40</td>
<td>61,000</td>
</tr>
<tr>
<td>Bidder 7</td>
<td>750,000</td>
<td>Bidder 41</td>
<td>33,000</td>
</tr>
<tr>
<td>Bidder 8</td>
<td>750,000</td>
<td>Bidder 42</td>
<td>32,000</td>
</tr>
<tr>
<td>Bidder 9</td>
<td>720,000</td>
<td>Bidder 43</td>
<td>31,000</td>
</tr>
<tr>
<td>Bidder 10</td>
<td>613,000</td>
<td>Bidder 44</td>
<td>28,000</td>
</tr>
<tr>
<td>Bidder 11</td>
<td>595,000</td>
<td>Bidder 45</td>
<td>25,000</td>
</tr>
<tr>
<td>Bidder 12</td>
<td>500,000</td>
<td>Bidder 46</td>
<td>25,000</td>
</tr>
<tr>
<td>Bidder 13</td>
<td>397,000</td>
<td>Bidder 47</td>
<td>20,000</td>
</tr>
<tr>
<td>Bidder 14</td>
<td>360,000</td>
<td>Bidder 48</td>
<td>19,000</td>
</tr>
<tr>
<td>Bidder 15</td>
<td>322,000</td>
<td>Bidder 49</td>
<td>15,000</td>
</tr>
<tr>
<td>Bidder 16</td>
<td>322,000</td>
<td>Bidder 50</td>
<td>14,000</td>
</tr>
<tr>
<td>Bidder 17</td>
<td>300,000</td>
<td>Bidder 51</td>
<td>13,000</td>
</tr>
<tr>
<td>Bidder 18</td>
<td>300,000</td>
<td>Bidder 52</td>
<td>10,000</td>
</tr>
<tr>
<td>Bidder 19</td>
<td>300,000</td>
<td>Bidder 53</td>
<td>10,000</td>
</tr>
<tr>
<td>Bidder 20</td>
<td>275,000</td>
<td>Bidder 54</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 21</td>
<td>270,000</td>
<td>Bidder 55</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 22</td>
<td>250,000</td>
<td>Bidder 56</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 23</td>
<td>250,000</td>
<td>Bidder 57</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 24</td>
<td>250,000</td>
<td>Bidder 58</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 25</td>
<td>200,000</td>
<td>Bidder 59</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 26</td>
<td>200,000</td>
<td>Bidder 60</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 27</td>
<td>200,000</td>
<td>Bidder 61</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 28</td>
<td>200,000</td>
<td>Bidder 62</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 29</td>
<td>160,000</td>
<td>Bidder 63</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 30</td>
<td>160,000</td>
<td>Bidder 64</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 31</td>
<td>150,000</td>
<td>Bidder 65</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 32</td>
<td>128,000</td>
<td>Bidder 66</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 33</td>
<td>100,000</td>
<td>Bidder 67</td>
<td>0</td>
</tr>
<tr>
<td>Bidder 34</td>
<td>96,000</td>
<td>Bidder 68</td>
<td>0</td>
</tr>
</tbody>
</table>
C. DISPERSION OF BIDS IN AUCTION 54

Bids were submitted by 47 Compliance-Oriented Entities and 20 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. Seven Compliance-Oriented Entities and eleven Investors submitted bids for a large quantity of allowances (i.e., at least 1 million tons). Overall, Compliance-Oriented Entities accounted for 46 percent of the quantity of allowances for which bids were submitted. The quantity of allowances for which bids were submitted was 2.5 times the Initial Offering. In the previous auction, the quantity of allowances for which bids were submitted was 2.4 times the Initial Offering.

The bid quantities were widely distributed among the 67 bidders. The concentration of bids, using the Herfindahl-Hirschman Index (“HHI”), was relatively low at 456. 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

<table>
<thead>
<tr>
<th>Quantity of Bids Submitted (in Thousands of Tons)</th>
<th>Number of Bidders in Range</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,000+</td>
<td>6</td>
</tr>
<tr>
<td>1,000-2,000</td>
<td>9</td>
</tr>
<tr>
<td>250-1,000</td>
<td>12</td>
</tr>
<tr>
<td>100-250</td>
<td>18</td>
</tr>
<tr>
<td>25-100</td>
<td>21</td>
</tr>
<tr>
<td>&lt;25</td>
<td>24</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>67</strong></td>
</tr>
</tbody>
</table>

**Compliance-Oriented Entities:**

- Number of Bidders: 47
- Compliance-Oriented Share of Bids: 46%
- Ratio of Bids to Supply (Initial): 2.5
- HHI of Bid Concentration: 456
D. SUMMARY OF BID PRICES IN AUCTION 54

Bids were submitted across a wide range of prices in the auction and the clearing price of $13.00 was relatively consistent with average bid prices submitted.

The following table reports several statistics regarding the bid prices for bids submitted in Auction 54. The median and mean bid prices are weighted by the quantity of each bid.

<table>
<thead>
<tr>
<th>Bid Prices:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Minimum</td>
<td>$2.38</td>
</tr>
<tr>
<td>Maximum</td>
<td>$17.00</td>
</tr>
<tr>
<td>Average (Median)</td>
<td>$12.91</td>
</tr>
<tr>
<td>Average (Mean)</td>
<td>$12.47</td>
</tr>
<tr>
<td>Clearing Price:</td>
<td>$13.00</td>
</tr>
</tbody>
</table>
E. NAMES OF POTENTIAL BIDDERS IN AUCTION 54

In accordance with Sections 2.8 and 3 of the Auction Notice for CO2 Allowance Auction 54, the Participating States are releasing the names of Potential Bidders in Auction 54. The states defined potential bidders as: “Each Applicant that has been qualified and submitted a complete Intent to Bid.” The list of 79 Potential Bidders is as follows:

A2E Solutions LLC
Air to Earth LLC
Appalachian Power Company
Astoria Energy, LLC
Bellus Ventures III LP
Birchwood Power Partners, L.P
BP Products North America Inc.
Braintree Electric Light Department
Buchanan Generation
Caithness Long Island, LLC
Calpine Energy Services, LP
Carbon Lighthouse Association
Carbon Market Exchange
City of Vineland
Clay Hills Management Ltd.
Clear Sky Enhanced Inflation Carbon Master Fund LP
Coloma Strategies LLC
Commonwealth Chesapeake Company, LLC
Consolidated Edison Comp. of NY, Inc.
Cooler, 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
Edgewood Energy, LLC
Elbow River Marketing LTD.
Element Markets Emissions, LLC
Empire Generating Co., LLC
Energy Center Dover
Equus Power I, LP
Exelon Generation Company, LLC
Footprint Power Salem Harbor Development LP
Helix Ravenswood Energy, LLC
Indeck Energy Serv. of Silver Springs
Indeck-Corinth Limited Partnership
Indeck-Olean Limited Partnership
Jamestown Board of Public Utilities
Kcarbon Holdings LLC
Kendall Green Energy LLC
Kleen Energy Systems, LLC
KMC Thermo, LLC
Koch Supply & Trading, LP
Liquidity Energy
Macquarie Energy, LLC
Manchester Street, L.L.C.
Mercuria Energy America, LLC
Morgan Stanley Capital Group, Inc.
MV Global Carbon Fund LP
National Grid Generation LLC dba National Grid
Nautilus Power, LLC
New Athens Generating Company, LLC
Newark Energy Center
NextEra Energy Marketing, LLC
Ocean State Power, LLC
Old Dominion Electric Cooperative
Pegasus Development Corporation
Pinelawn Power, LLC
Pixelle Androscoggin 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
Tenaska Power Services Co.
Tenaska, Inc.
Trafigna Trading LLC
Village of Freeport
Virginia Electric and Power Company
Vitol Inc.
Wallingford Energy, LLC