

Moderating Price Volatility By Adding Market Controls: Unintended Consequences

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Presentation Outline

Concerns

- Prices will exceed acceptable levels
- Prices will fall and not incent innovation
- Systemic risk
- No transparency
- Allowance bubbles
- Manipulation

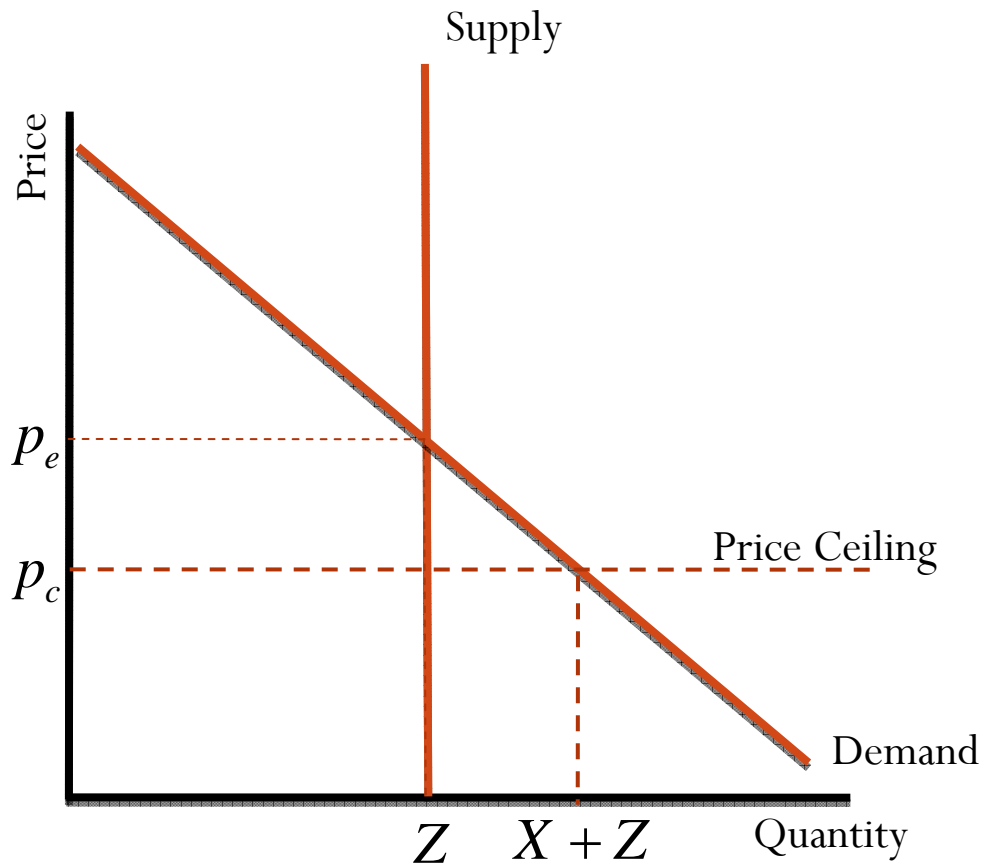
Considered Limits

- Price ceiling
- Price Floor
- Prohibit Derivatives
- Prohibit Speculators

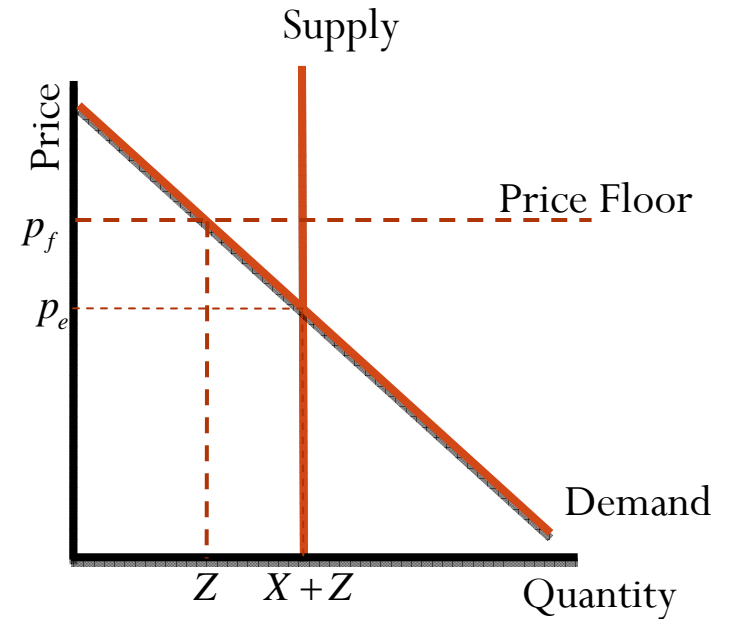
For more information

- Congressional Budget Office. *Evaluating Limits on Participation and Transactions in Markets for Emissions Allowances*. December 2010.
- Congressional Budget Office. *Managing Allowance Prices in a Cap-and-Trade Program*. November 2010.
- Andrew Stocking. *Unintended Consequences of Price Controls: An Application to Allowance Markets*. CBO Working Paper 2010-06. September 2010.

Implementing Price Control Through Supply Management

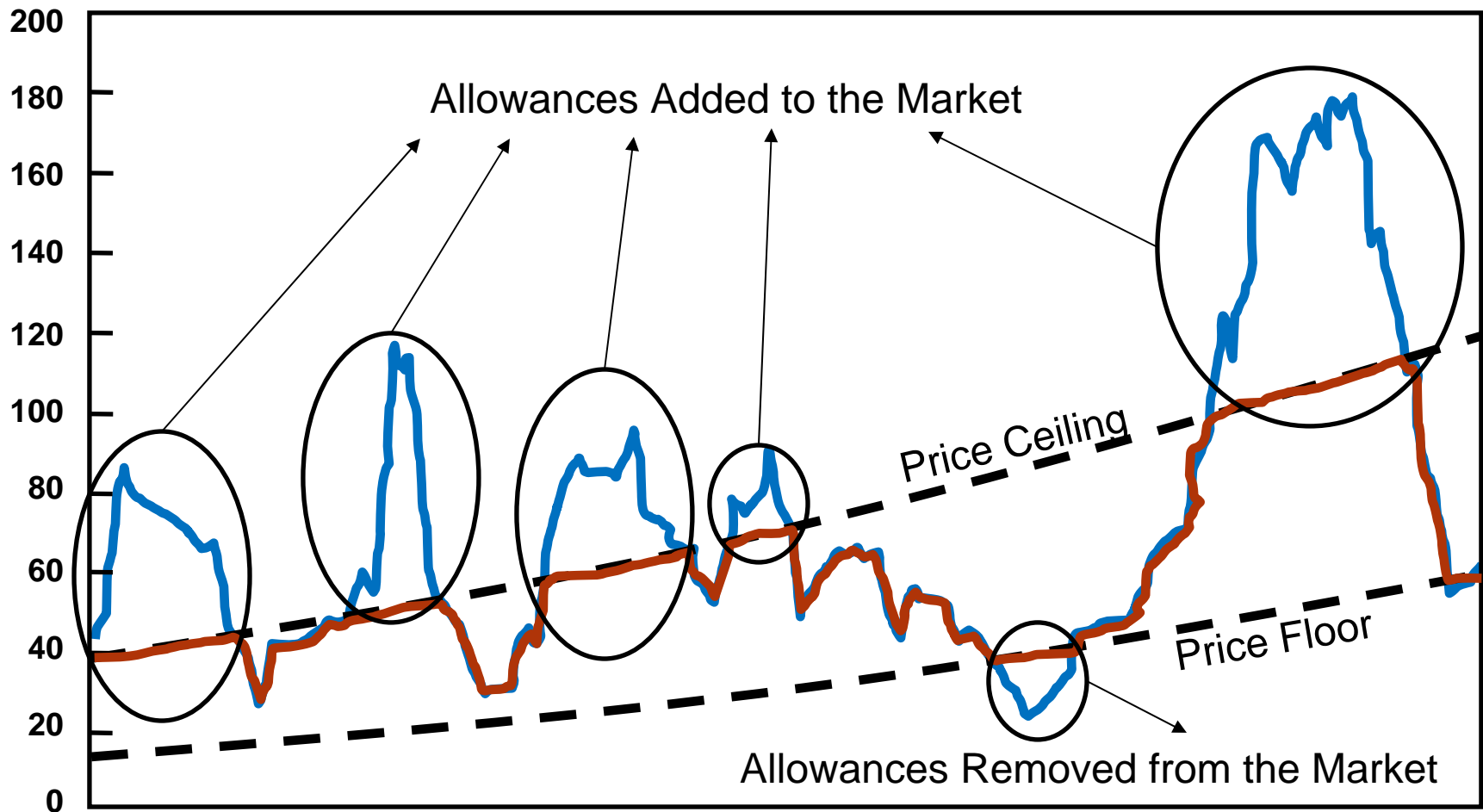


New Allowances = X



Removed Allowances = X

Price Ceilings and Floors (a.k.a. the Safety Valve)



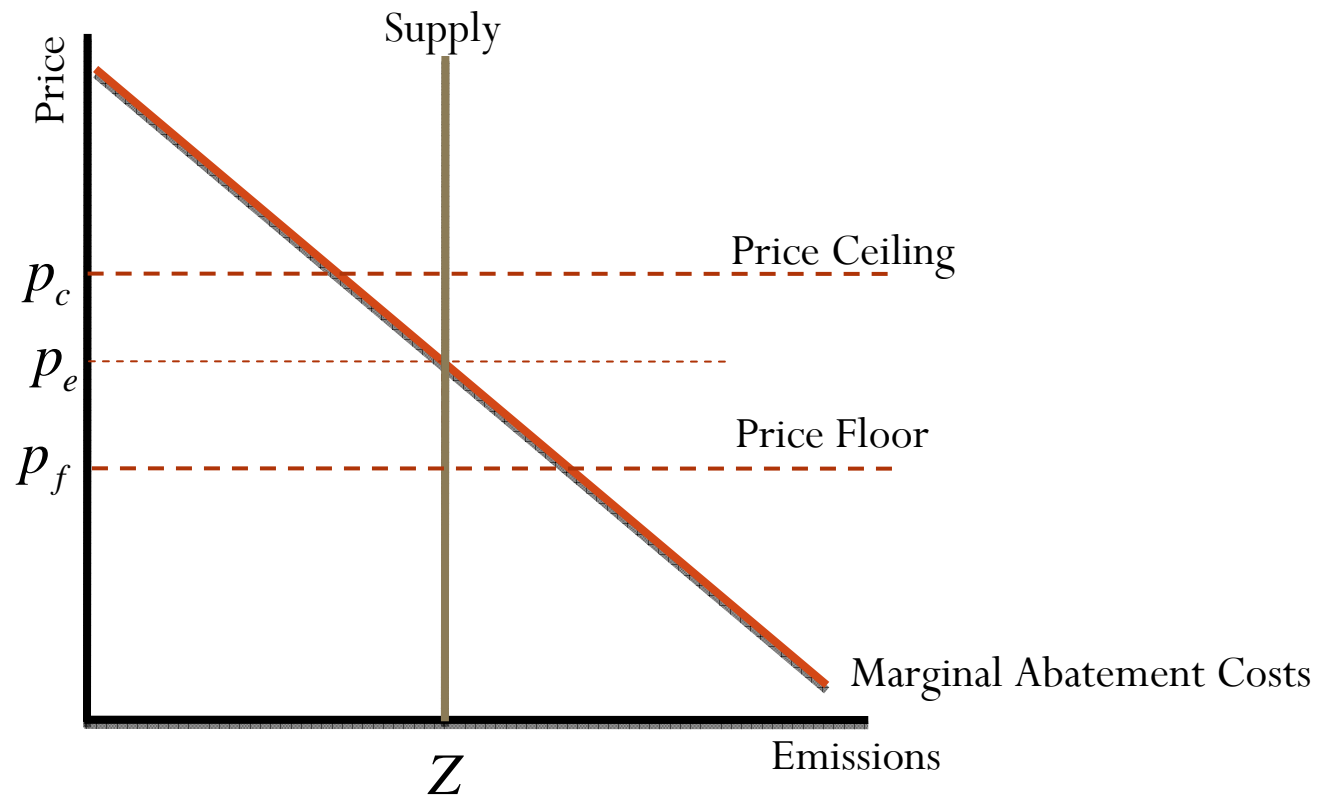
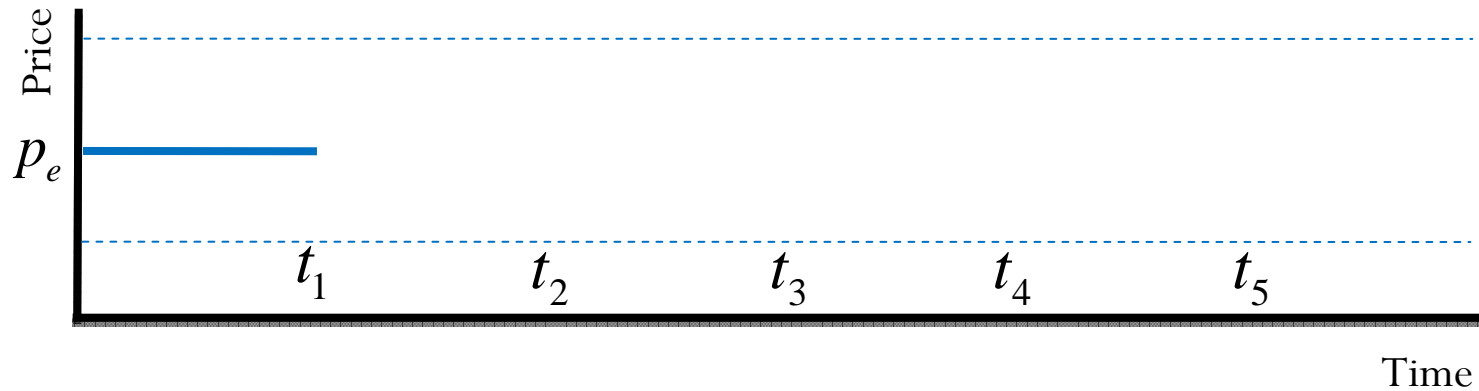
Behavioral Effects of Price Controls

- Price behavior near the ceiling/floor
 - Krugman, (QJE, 1991)
 - Target zone has stabilizing effect *if credible zone*
- If not credible: Speculative attacks at exchange rate target zone floor
 - Mexican Peso (Dec 22, 1994), Thai Baht (July 2, 1997), Malaysian Ringgit (July 14, 1997), English Pound (Sept 16, 1992)
 - Volatility near boundary increases as you introduce uncertainty about credibility of government to maintain boundary
- Likely that allowance price ceiling can be credible, given de minimis cost of printing allowances
- Other experience with price controls
 - Tin market collapsed in 1985 because International Tin Council couldn't maintain the floor
 - Gold prices actually increased faster given potential for unannounced price management (threat of govt release caused extractors and speculators to require a higher rate of return to hold gold)
 - California Electricity Prices (price ceiling)

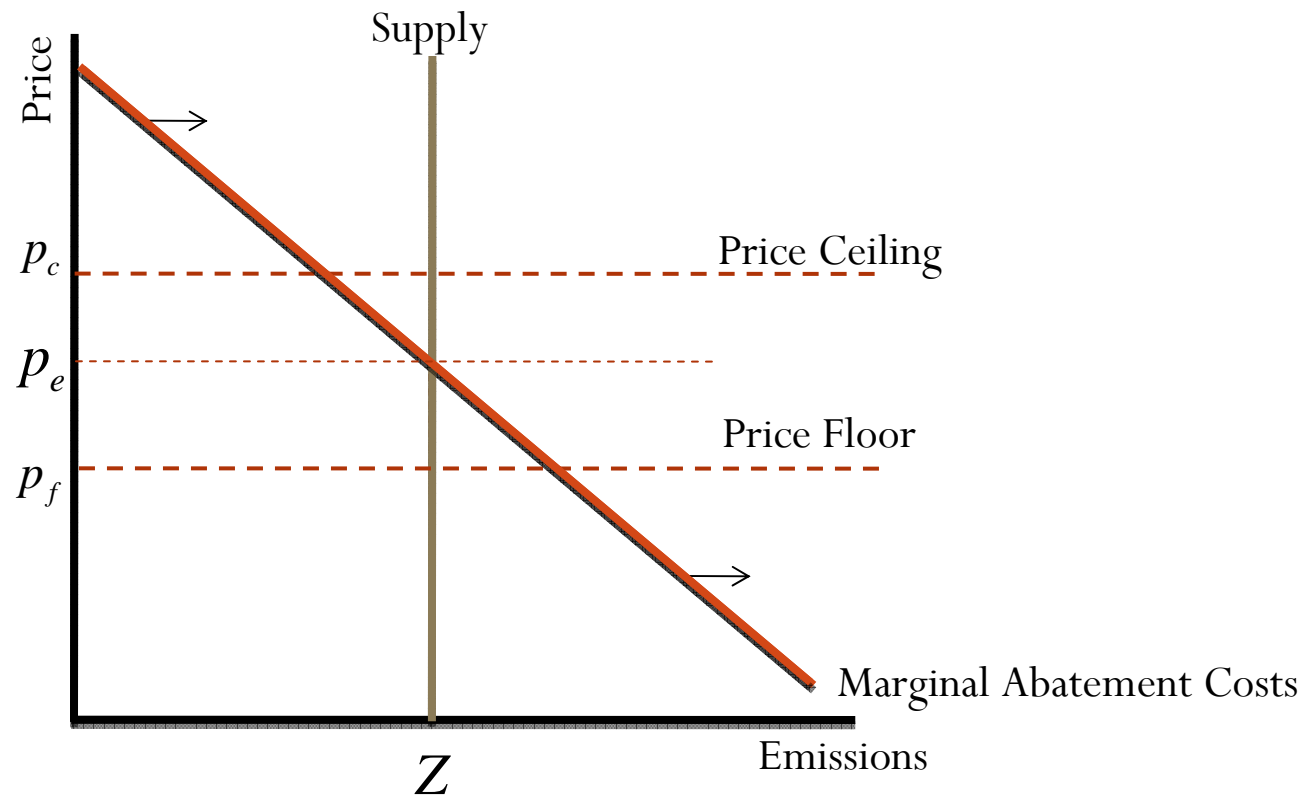
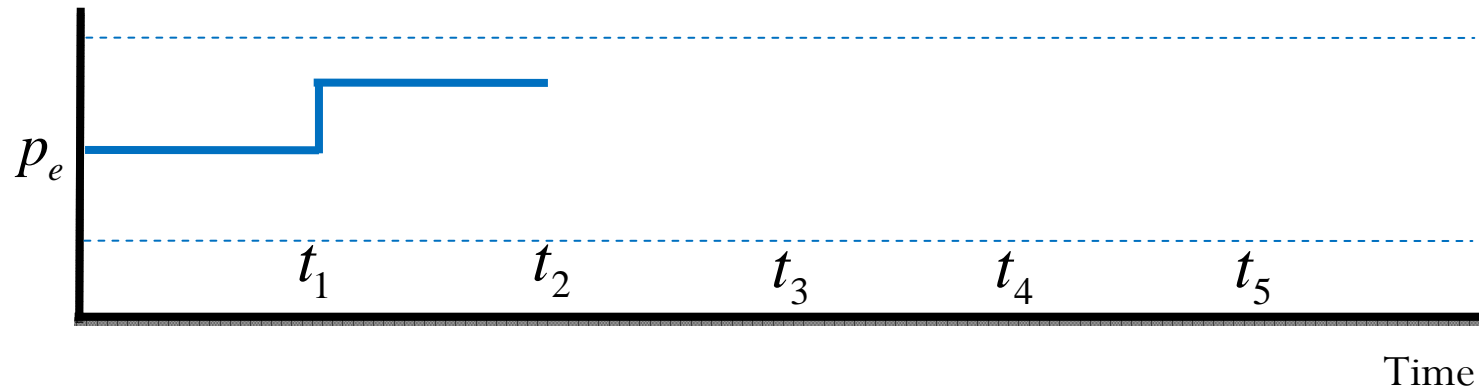
The Carbon Market Context

- Waxman-Markey (HR2454) - Strategic Reserve
 - Price Ceiling (\$28) and Price Floor (\$10) rising at 5% real (2009\$)
- Kerry-Boxer (S1733) – Market Stability Reserve
 - Price Ceiling (\$28) and Floor (\$10) escalate at 5% real (KB ceiling 7% after 2017) (2005\$)
- Kerry-Lieberman – Cost Containment Reserve
 - Price ceiling (\$25) and Floor (\$12) rising at 5% and 3% real, respectively (2009\$)
- Nature of Supply for maintaining price ceiling
 - Sources of Supply (New / Taken from Future)
 - Size of Release (Limited / Unlimited)
 - Replenishing Allowances taken from future (Replace / Do not Replace)

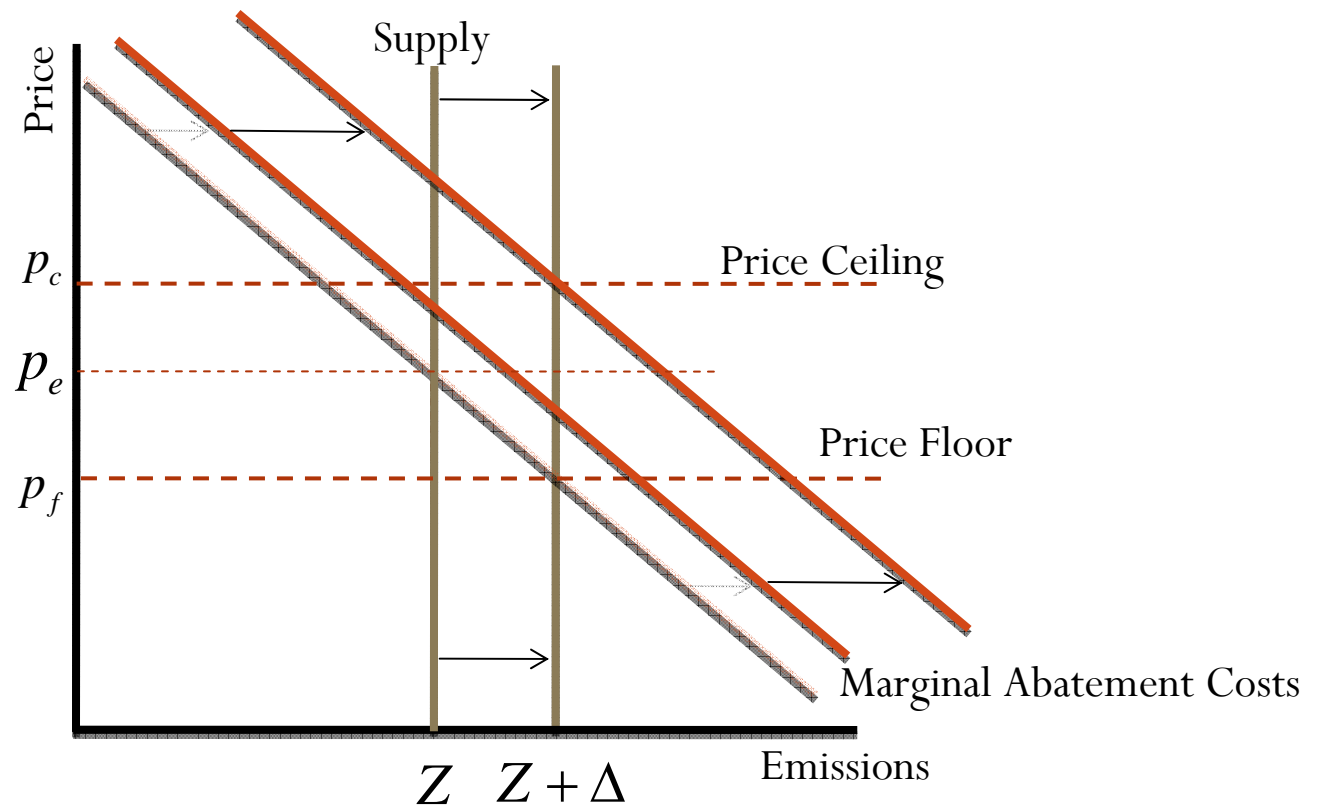
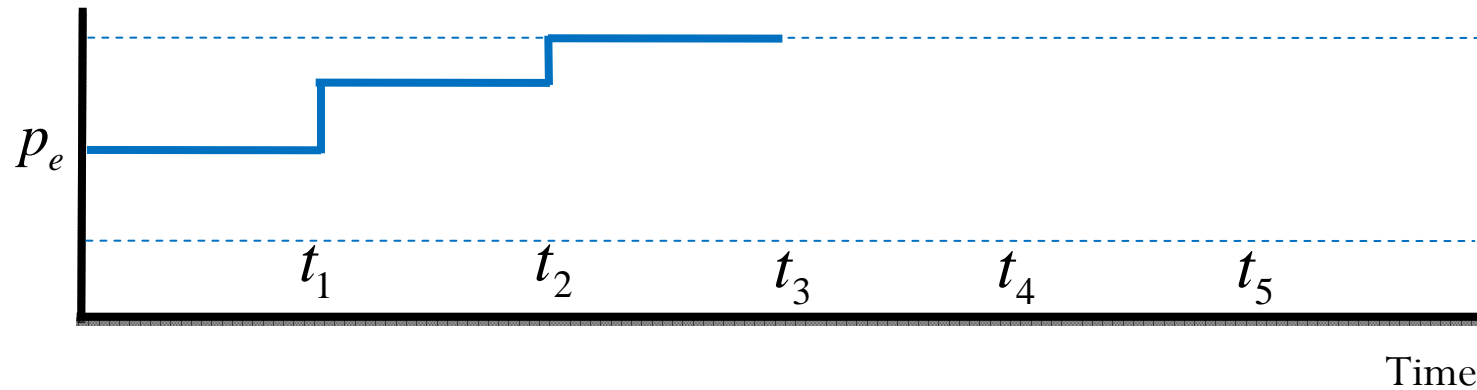
Price Path Asymmetry



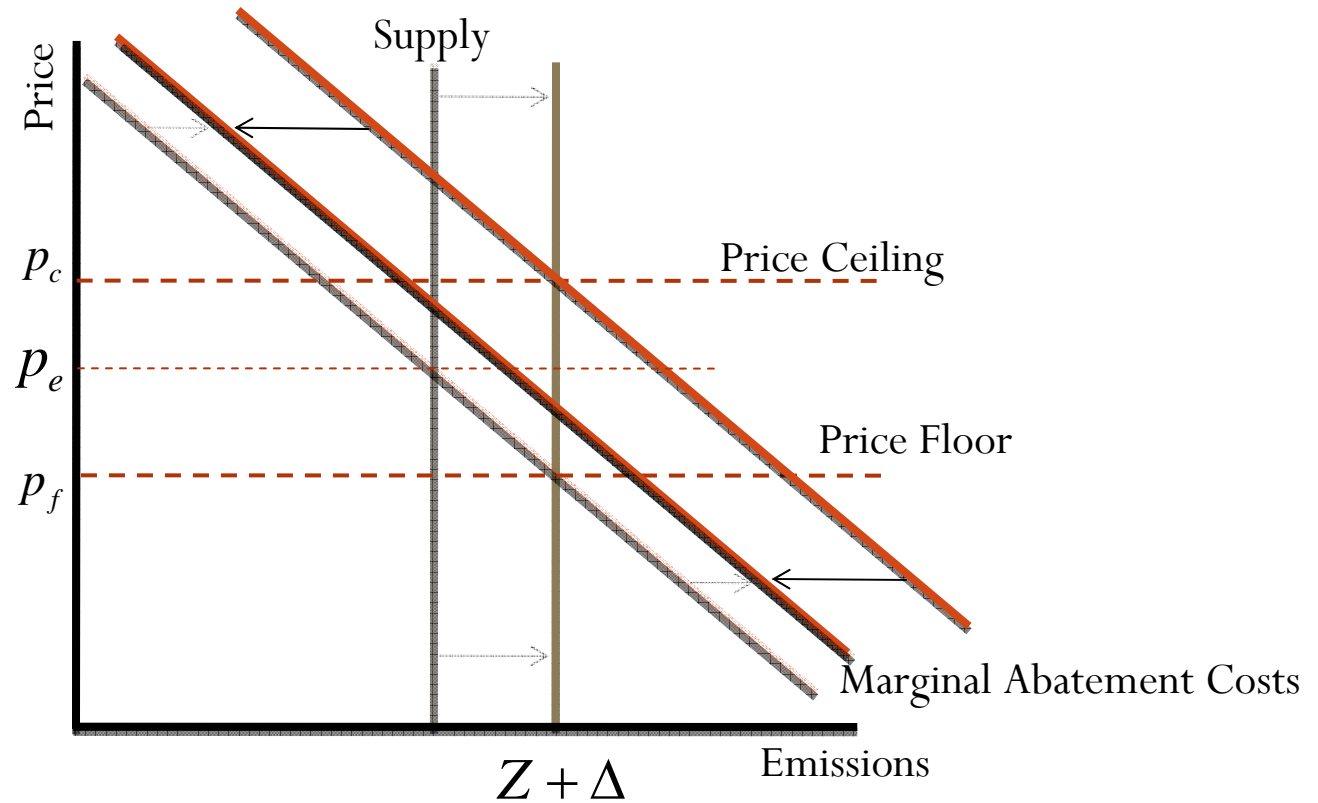
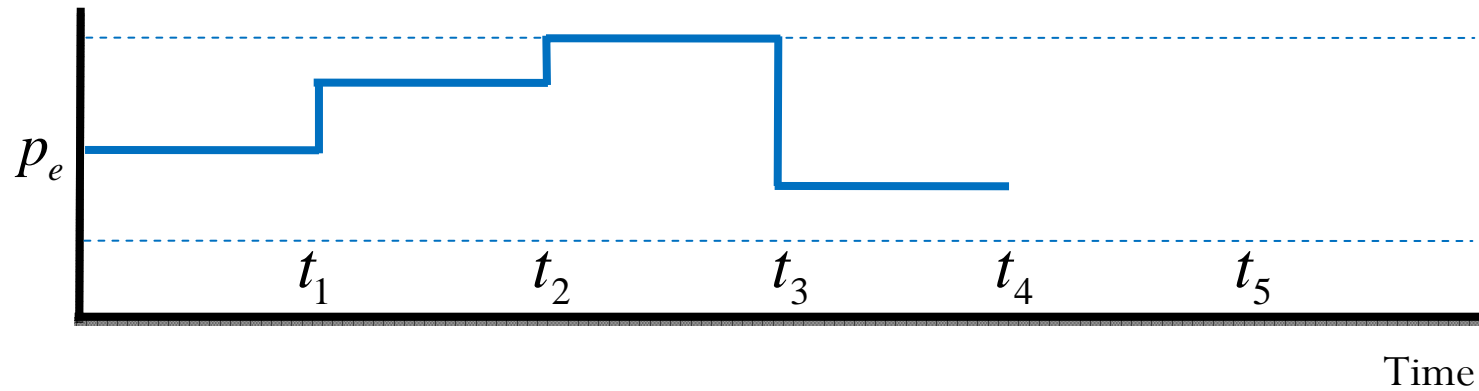
Price Path Asymmetry



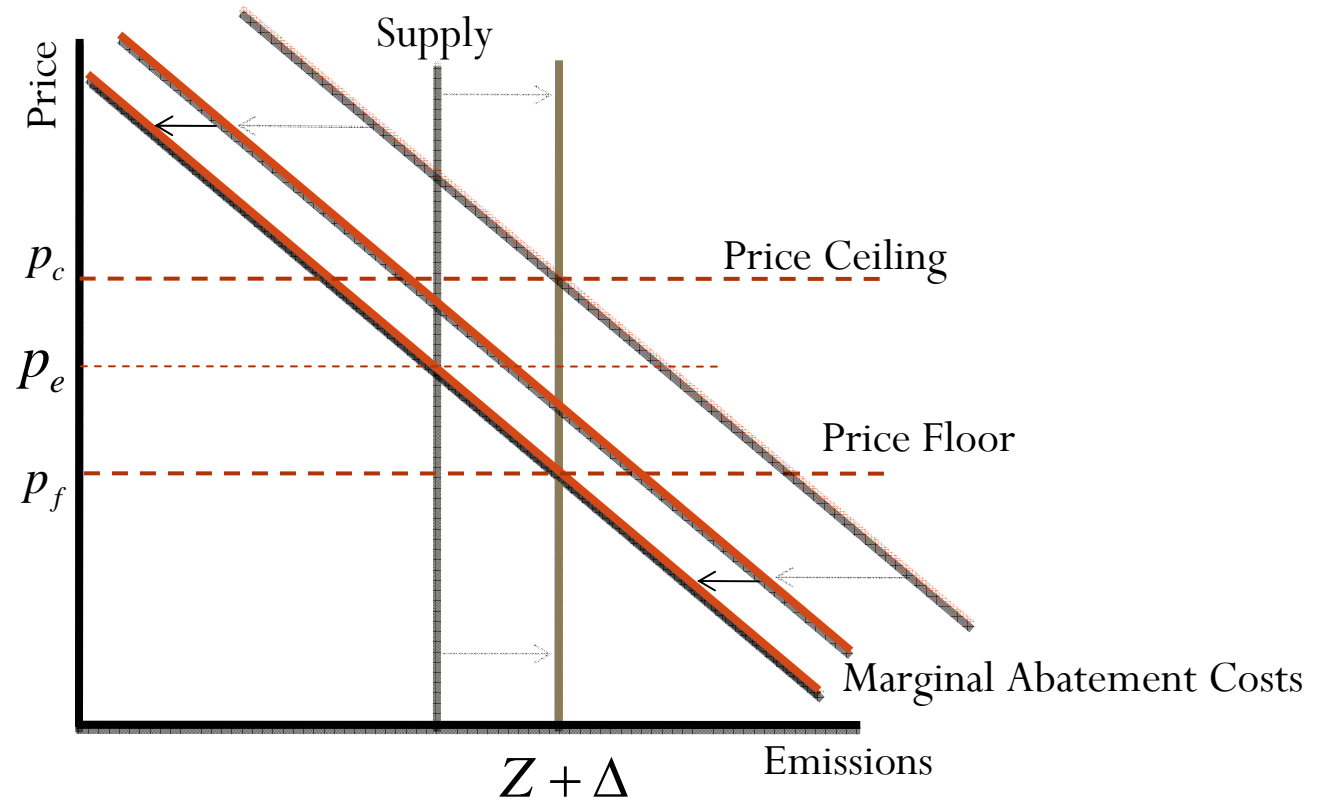
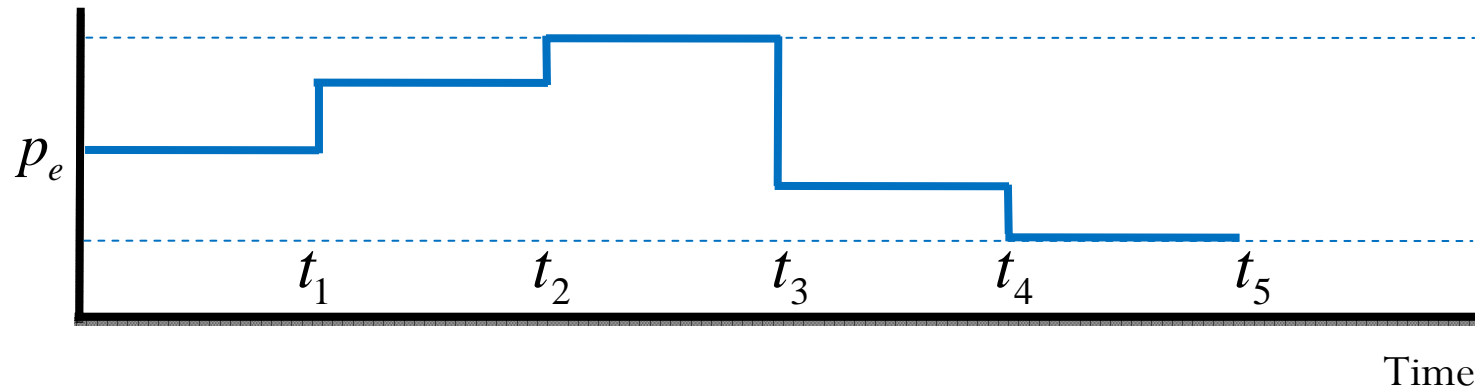
Price Path Asymmetry



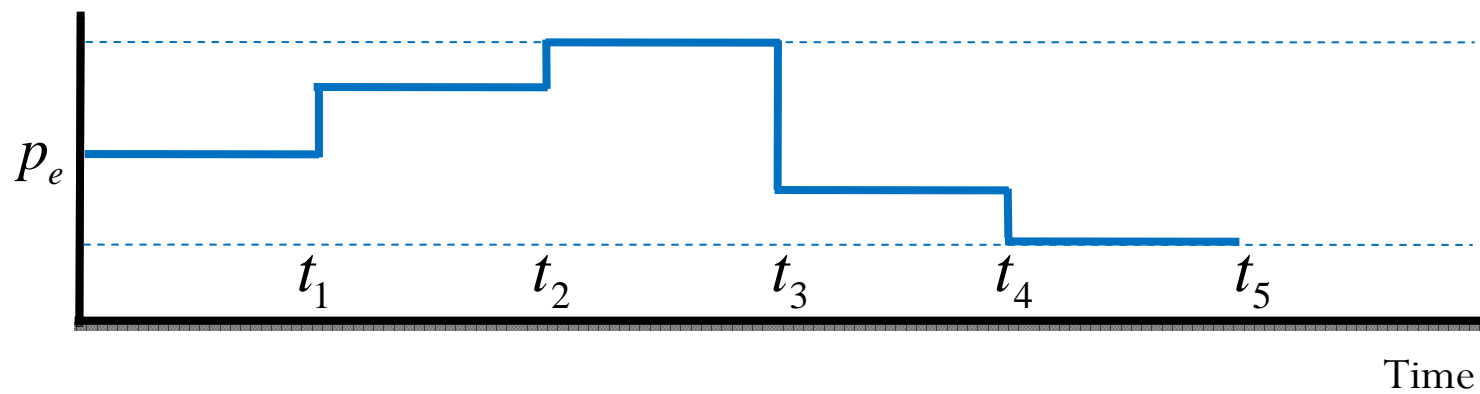
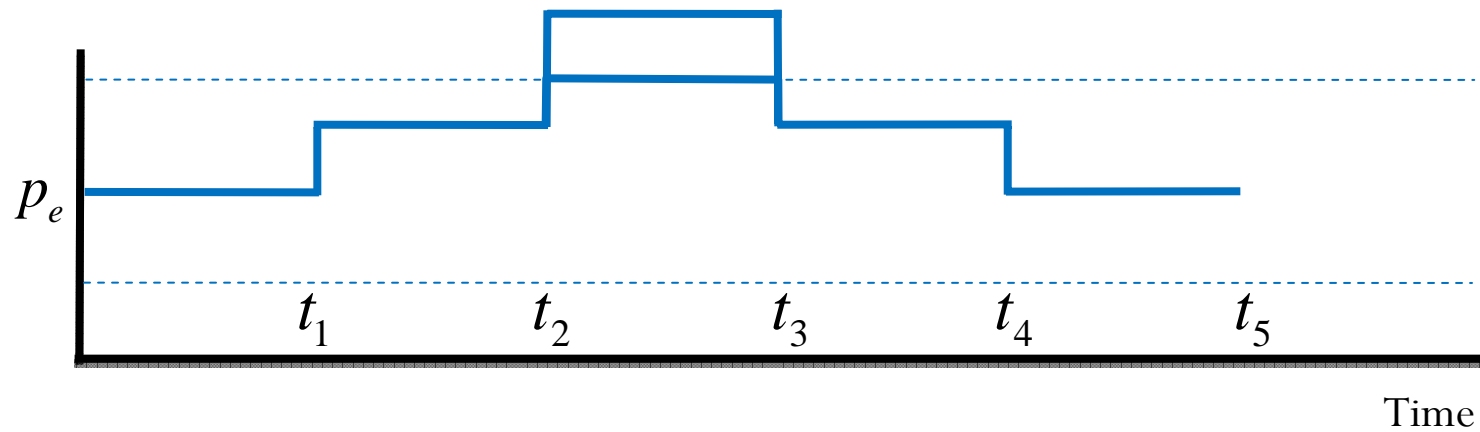
Price Path Asymmetry



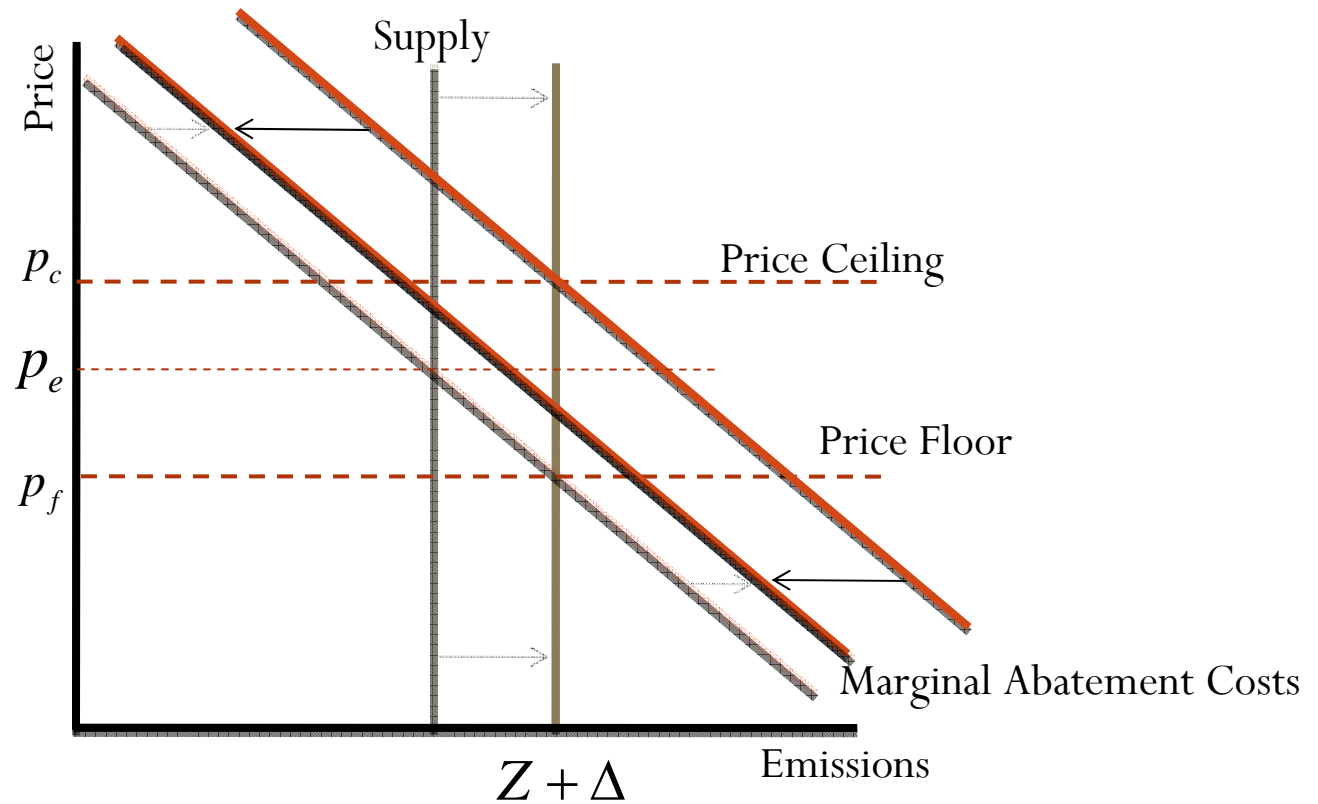
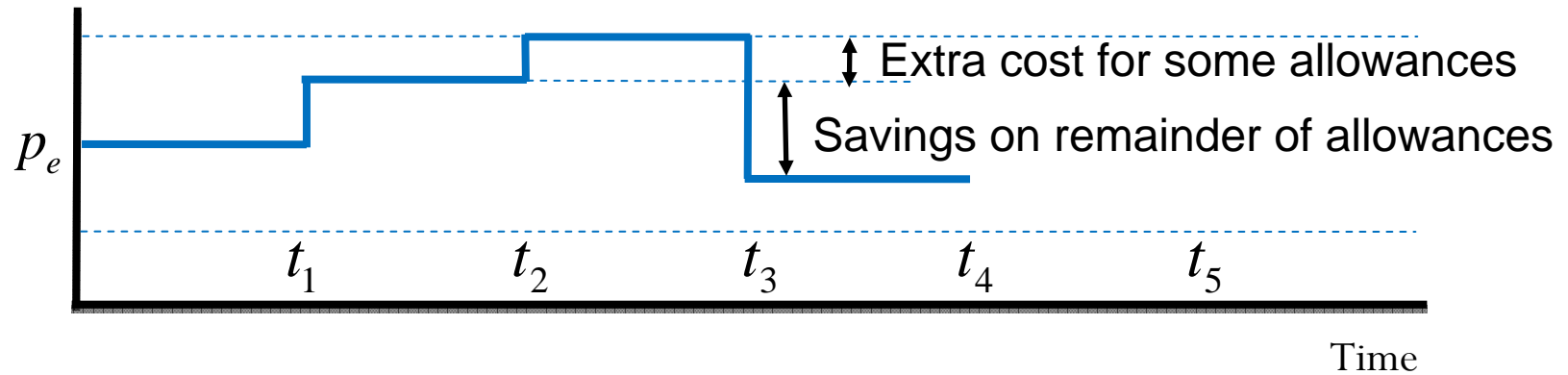
Price Path Asymmetry



Price Path Asymmetry



Price Path Asymmetry



Application to the carbon market?

- Are there ways to manipulate the market given potential designs of the price ceiling?
 - YES, but depends on specific design
- Is there a financial benefit to be had from manipulating the market?
 - POSSIBLY, depends on conditions, elasticities, and market structure
- Can the manipulation be implemented unilaterally or is a coalition needed?
 - MAYBE, depends on market structure

Deviation Modeling Results

Planning Horizon (PH)	No. Allowances Issued Over PH (millions)	Coalition (%)	Deviation (as % of Coalition Demand over PH)	Deviation (as % of Coalition Demand in 1 st Yr)	Cost with No Deviation (\$ billions)	Cost of Deviation Investment (\$ billions)	Cost Under Deviation (excl. dev. Allowances) (\$ billions)	Annualized Effective Real Return on Deviation Investment
3	15,000	5	10	30	\$18	\$0.45	\$17.7	11-16%
		10	10	30	\$36	\$0.90	\$33.6	41-46%
5	25,000	5	10	50	\$30	\$0.75	\$29.0	7-10%
		10	10	50	\$60	\$1.50	\$56.0	23-26%
10	50,000	5	10	100	\$60	\$1.50	\$58.0	4-6%
		10	10	100	\$120	\$3.00	\$111.9	12-13%

More Information: Andrew Stocking. *Unintended Consequences of Price Controls: An Application to Allowance Markets*. CBO Working Paper 2010-06. September 2010.

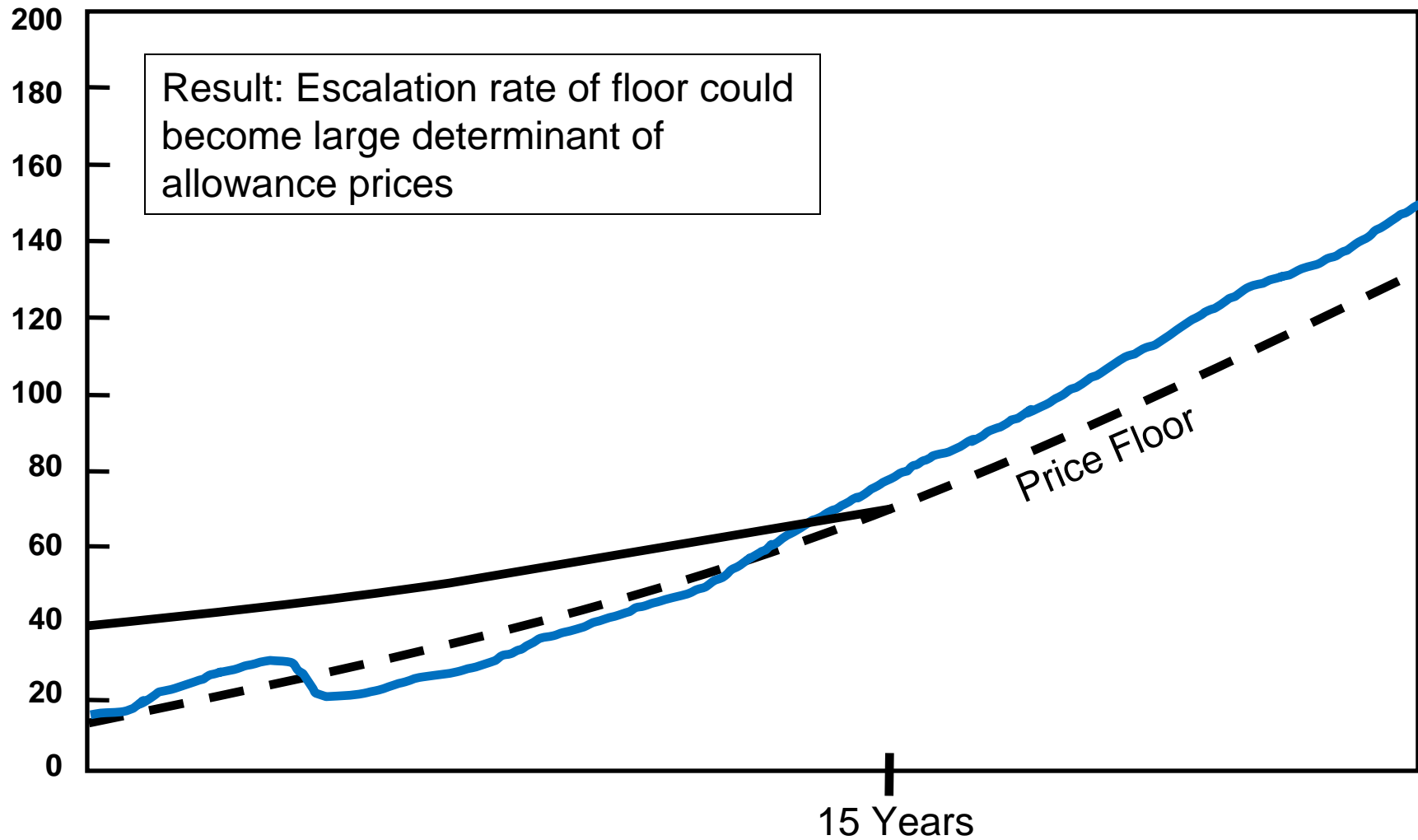
Price Floor

- Intended to increase the stringency of the cap when the price approaches the floor
- Implementation
 - Introduce new allowances with reserve price (auction)
 - Program administrator stands ready to buy at floor price (credibility issues?)
- Design of the Price Floor
 - Floors rise at a given real rate (5% WM/KB, 3% KL)

More Information: Congressional Budget Office. *Managing Allowance Prices in a Cap-and-Trade Program*. November 2010.

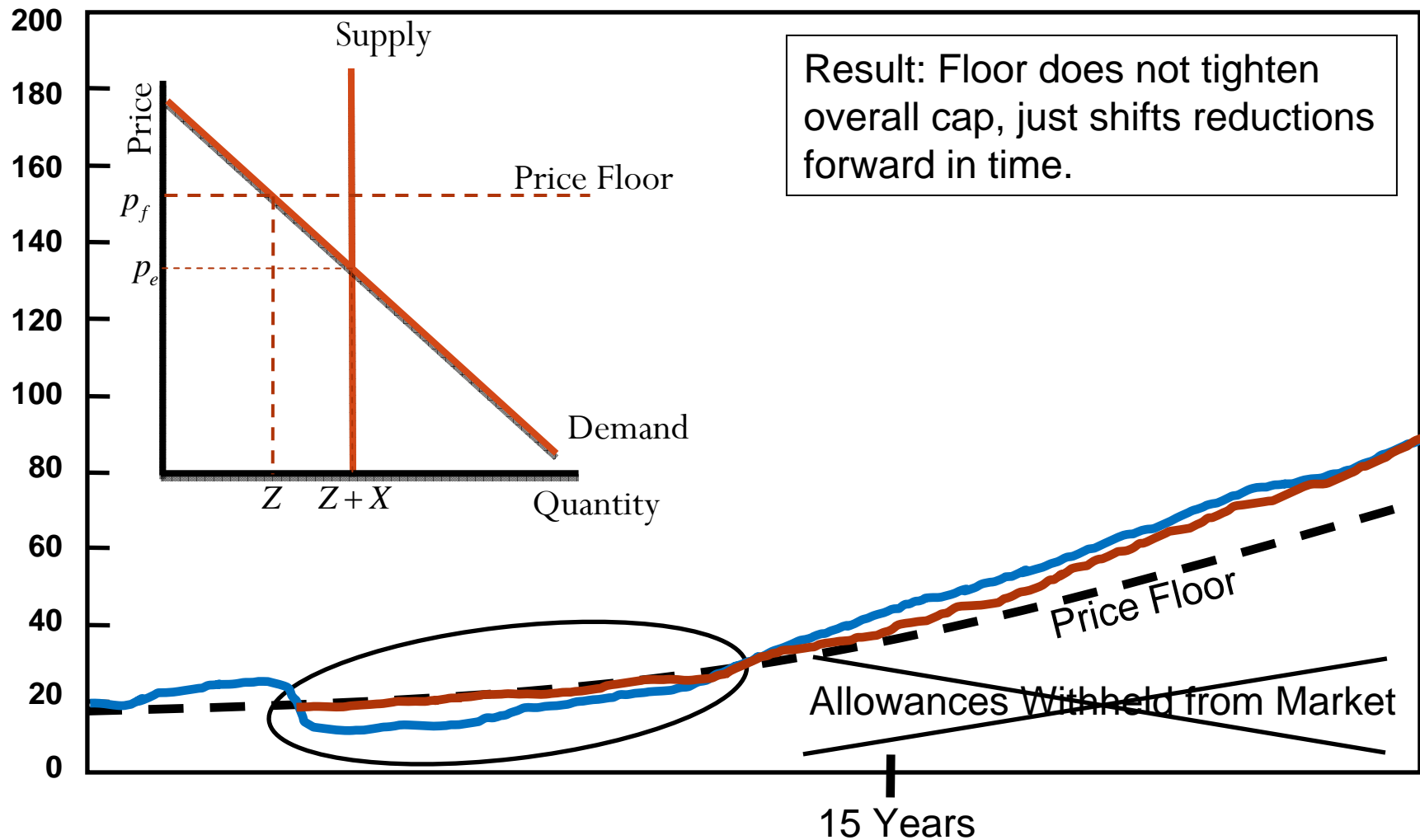
Price Floors

(Escalation Rate > Risk Free Rate)



Price Floors

(Black-Scholes Put Option for Floor Allowances)



Part II: Limits to Speculators and Derivatives

Addressing concerns about:

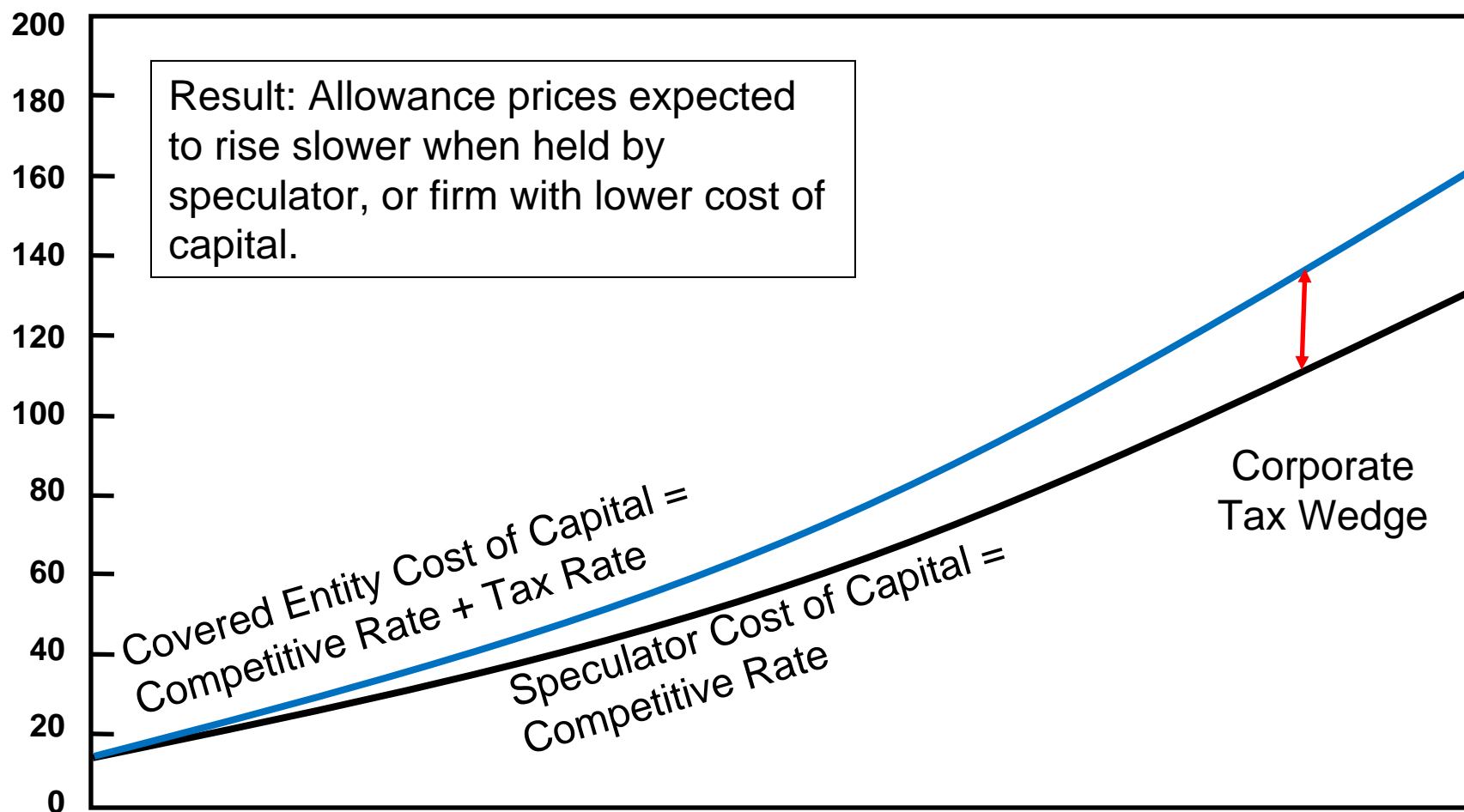
- 1) Systemic risk;
- 2) Lack of transparency;
- 3) Allowance bubbles; and
- 4) Manipulation

More Information: Congressional Budget Office. *Evaluating Limits on Participation and Transactions in Markets for Emissions Allowances*. December 2010.

Limiting Market Participation

- Benefits of speculators
 - Increased liquidity
 - Lower bid/ask spreads
 - Speculator decision to buy/sell not correlated with covered entity need to buy/sell allowances
 - More information (from diverse sources)
 - Profit from bringing accurate information to the market
 - Holding banked allowances
 - Banked allowances tie up capital
 - Speculators have lower cost of capital (no/limited corporate income taxes) relative to covered entities

Two Firms: Two Capital Costs



Prohibiting Speculators

- Reduced liquidity and increased volatility
 - If a few participants accounted for large fraction of market, increased ease of manipulation
- Removing class of traders who profit by providing services to market would create profit incentive for remaining traders
 - Or create incentive for excluded traders to purchase small covered entity
- Increased concentration of risk by covered entities could have unintended consequences
- Enforcement difficult

Alternatives to Prohibiting Speculators

- Position limits
 - Expanded use under Dodd-Frank
- Circuit breakers
 - Expanded use following May 6, 2010 flash crash

Limiting Transactions

- Some proposals to limit derivatives
- Benefits of derivatives
 - Allowance derivatives allow covered entities to manage price volatility risk
 - Lower transaction costs than buying allowances and holding them
 - Short sales could dampen/reduce bubble formation

Possible Market Responses to Derivatives Prohibition

- Hedge risk using correlated commodities (e.g., natural gas or oil)
 - Not perfect hedge
 - Introduces other asset variability into allowance prices
- Move allowance derivatives to overseas markets outside U.S. regulatory authority
- Enforcement difficulty

Alternatives to Prohibiting Derivatives

- Reliance on Centralized Clearing
 - Heightened market transparency and stability
- Trading Through Formal Exchanges
 - Increased transparency and standardization
- Increased Regulation of Over-the-Counter Trading
 - Improved tracking
 - Increased margin requirements

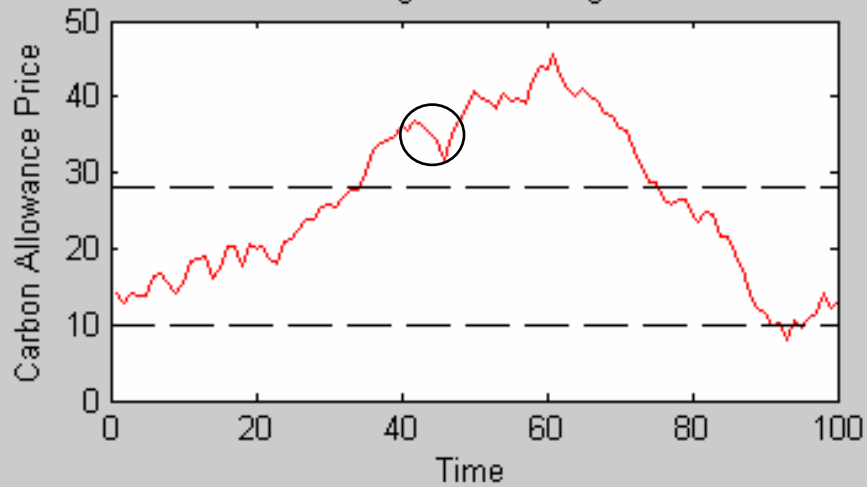
Thank you!

All of CBO's work on climate change is available at:
www.cbo.gov/link/cc

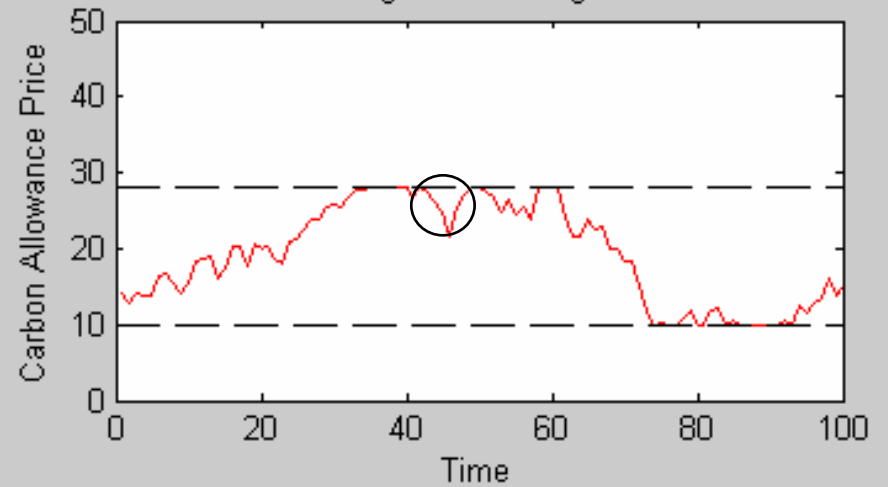


More Complicated Information Environment

Price and Quantity Performance
without Binding Price Ceiling and Floor



Price and Quantity Performance
with Binding Price Ceiling and Floor



Prices simulated by random draws