

---

**RGGI Inc.**



**MARKET MONITOR REPORT  
FOR AUCTION 36**

**Prepared for:**

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

**Prepared By:**

**POTOMAC  
ECONOMICS**

June 9, 2017

---

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 (CO<sub>2</sub>) 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 36**

As the Market Monitor for the RGGI CO<sub>2</sub> 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, Inc. This report summarizes our findings regarding RGGI Auction 36, which was held on June 7, 2017.

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 bidders participated in the offering of CO<sub>2</sub> allowances. Bids were submitted to purchase 2.1 times the available supply of allowances, resulting in a clearing price of \$2.53 per ton. Compliance-Oriented Entities purchased 36 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 36 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<sub>2</sub> allowances and outcomes of the auction.

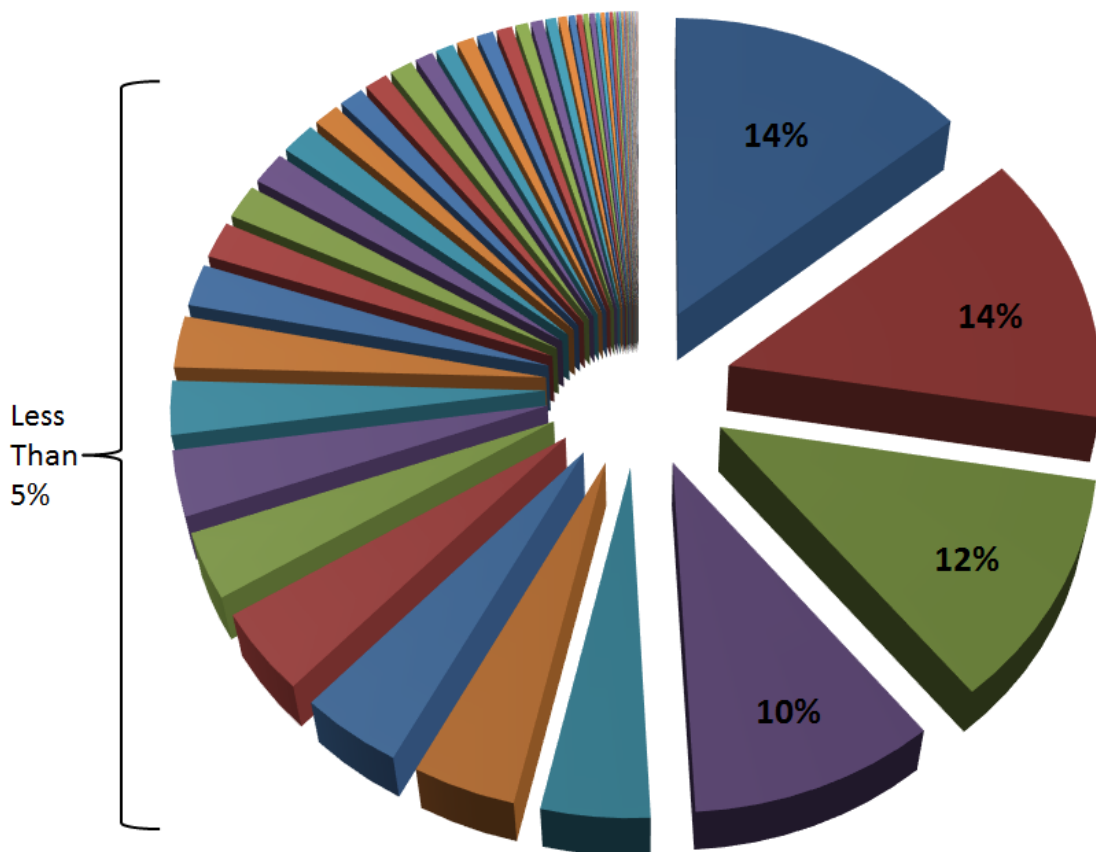
**APPENDIX**

**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 14 percent of the total projected demand for allowances. 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 36

*Awards were distributed across 38 bidders with six bidders purchasing one million tons or more and twelve bidders purchasing 300,000 tons or more.*

This report summarizes participation in Auction 36. For reporting purposes, firms are often broken up into the following distinct categories.

- *Compliance-Oriented Entities* – Compliance entities that appear to acquire and hold allowances primarily to satisfy their compliance obligations.
- *Investors with Compliance Obligations* – 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.<sup>1</sup>
- *Investors without Compliance Obligations* – 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.<sup>2</sup> 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 36, Compliance Entities purchased 49 percent of the allowances sold. In the first 36 RGGI auctions, Compliance Entities purchased 76 percent of the allowances sold. In Auction 36, Compliance-Oriented Entities purchased 36 percent of the allowances sold.

After settlement of allowances sold in Auction 36:

---

<sup>1</sup> 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 over time as more information becomes available.

<sup>2</sup> 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.

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

**Table 1: Quantity of Allowances Awarded by Bidder**

---

<b>Bidder</b>	<b>Number of Allowances Awarded</b>
<b>Bidder 1</b>	<b>2,900,000</b>
<b>Bidder 2</b>	<b>1,725,000</b>
<b>Bidder 3</b>	<b>1,500,000</b>
<b>Bidder 4</b>	<b>1,500,000</b>
<b>Bidder 5</b>	<b>1,250,000</b>
<b>Bidder 6</b>	<b>1,000,000</b>
<b>Bidder 7</b>	<b>700,000</b>
<b>Bidder 8</b>	<b>673,000</b>
<b>Bidder 9</b>	<b>500,000</b>
<b>Bidder 10</b>	<b>450,000</b>
<b>Bidder 11</b>	<b>378,000</b>
<b>Bidder 12</b>	<b>305,000</b>
<b>Bidder 13</b>	<b>265,000</b>
<b>Bidder 14</b>	<b>234,000</b>
<b>Bidder 15</b>	<b>202,470</b>
<b>Bidder 16</b>	<b>165,000</b>
<b>Bidder 17</b>	<b>115,000</b>
<b>Bidder 18</b>	<b>103,000</b>
<b>Bidder 19</b>	<b>100,000</b>
<b>Bidder 20</b>	<b>75,000</b>
<b>Bidder 21</b>	<b>65,000</b>
<b>Bidder 22</b>	<b>56,000</b>
<b>Bidder 23</b>	<b>50,000</b>
<b>Bidder 24</b>	<b>50,000</b>
<b>Bidder 25</b>	<b>50,000</b>
<b>Bidder 26</b>	<b>31,000</b>
<b>Bidder 27</b>	<b>30,000</b>
<b>Bidder 28</b>	<b>27,000</b>
<b>Bidder 29</b>	<b>23,000</b>
<b>Bidder 30</b>	<b>22,000</b>
<b>Bidder 31</b>	<b>20,000</b>
<b>Bidder 32</b>	<b>10,000</b>
<b>Bidder 33</b>	<b>7,000</b>
<b>Bidder 34</b>	<b>6,000</b>
<b>Bidder 35</b>	<b>3,000</b>
<b>Bidder 36</b>	<b>3,000</b>
<b>Bidder 37</b>	<b>2,000</b>
<b>Bidder 38</b>	<b>2,000</b>

---

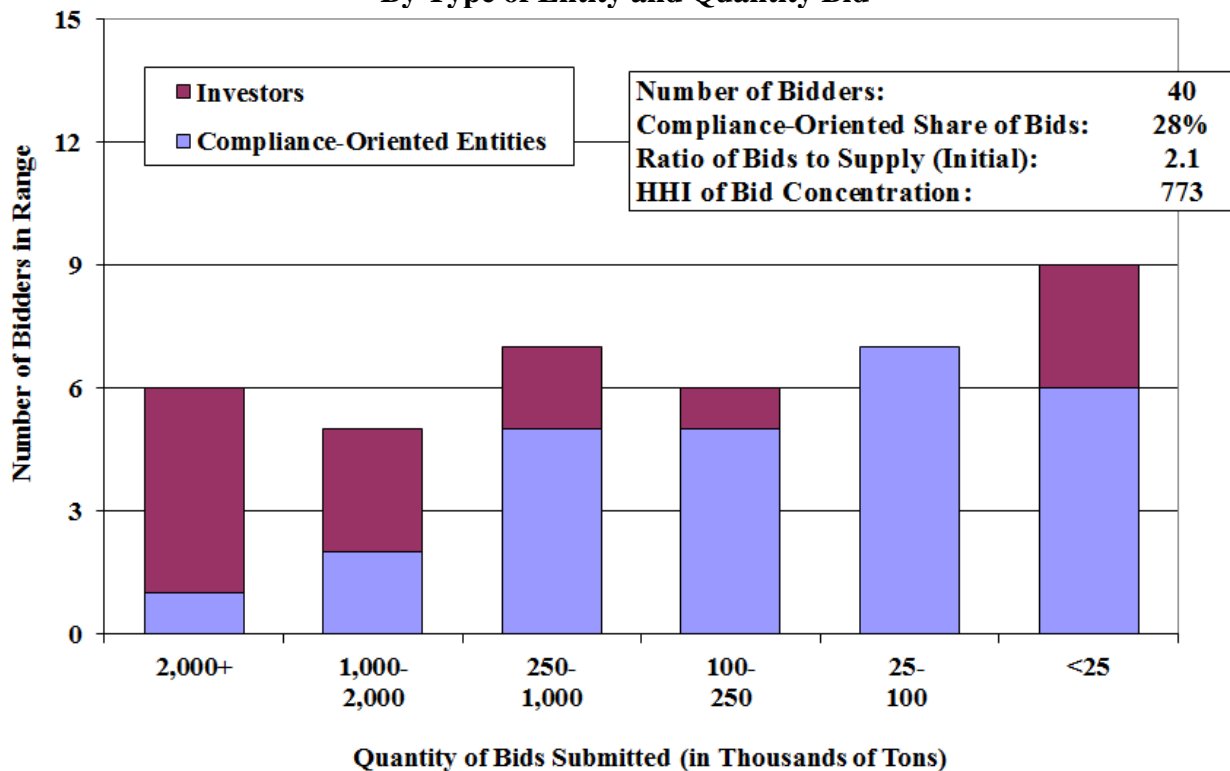
**C. DISPERSION OF BIDS IN AUCTION 36**

*Bids were submitted by 26 Compliance-Oriented Entities and 14 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. One Compliance-Oriented Entity and five Investors submitted bids for a large quantity of allowances (i.e., at least 2 million tons). Overall, Compliance-Oriented Entities accounted for 28 percent of the quantity of allowances for which bids were submitted. The quantity of allowances for which bids were submitted was 2.1 times the available supply. In Auction 35, the quantity of allowances for which bids were submitted was 2.2 times the Initial Offering.

The bid quantities were widely distributed among the 40 bidders. The concentration of bids, using the Herfindahl-Hirschman Index (“HHI”), is relatively low at 773, 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 2: Quantity of Bids Submitted by Entity  
By Type of Entity and Quantity Bid**





**D. SUMMARY OF BID PRICES IN AUCTION 36**

*Bids were submitted across a wide range of prices in the auction and the clearing price of \$2.53 was relatively consistent with average bid prices submitted.*

The following table reports several statistics regarding the bid prices for bids submitted in Auction 36. The median and mean bid prices are weighted by the quantity of each bid.

---

<b>Bid Prices:</b>	
<b>Minimum</b>	<b>\$2.15</b>
<b>Maximum</b>	<b>\$6.00</b>
<b>Average (Median)</b>	<b>\$2.52</b>
<b>Average (Mean)</b>	<b>\$2.57</b>
<b>Clearing Price:</b>	<b>\$2.53</b>

---

**E. NAMES OF POTENTIAL BIDDERS IN AUCTION 36**

In accordance with Sections 2.8 and 3 of the Auction Notice for CO<sub>2</sub> Allowance Auction 36, the Participating States are releasing the names of Potential Bidders in Auction 36. The states defined potential bidders as: “Each Applicant that has been qualified and submitted a complete *Intent to Bid*.” The list of 48 Potential Bidders is as follows:

Adirondack Council Inc.	Kendall Green Energy, LLC
Astoria Energy, LLC	KMC Thermo, LLC
BP Products North America Inc.	Koch Supply & Trading, LP
Brooklyn Navy Yard Cogen Partners, LP	Luminus Energy Partners Master Fund, Ltd.
Caithness Long Island, LLC	Macquarie Energy, LLC
Calpine Energy Services, LP	Massachusetts Water Resources Authority
Carbon Lighthouse Association	Mercuria Energy America, Inc.
Castleton Commodities Merchant Trading, LP	Morgan Stanley Capital Group, Inc.
Cayuga Operating Company, LLC	National Grid Gen. dba National Grid
City of Dover	NextEra Energy Marketing, LLC
Consolidated Edison Comp. of NY, Inc.	Noble Americas Gas & Power Corp.
CPV Maryland, LLC	NRG Power Marketing, LLC
Delaware City Refining Company, LLC	Old Dominion Electric Cooperative
Delaware Municipal Electric Corp.	Power Authority of the State of New York
Dominion Energy Marketing, Inc.	PSEG Energy Resources & Trade, LLC
DRW Commodities, LLC	Public Service Company of New Hampshire
DTE Energy Trading, Inc.	RBC
Exelon Generation Company, LLC	Selkirk Cogen Partners, LP
Fathom Energy, LLC	Shell Energy North America (US), LP
GenOn Energy Management, LLC	Statkraft US, LLC
Hawkeye Energy Greenport	Verso Corporation
Indeck-Corinth Limited Partnership	Village of Freeport
Jamestown Board of Public Utilities	Vitol Inc.
J-Power USA Development Co., Ltd.	Wallingford Energy, LLC