

Distributing Allowance Value: Overview

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What is an allowance?

- Under a cap and trade program, the government:
 - Sets a cap on emissions
 - Issues tradable “allowances” (authorizations to emit; each authorizes one ton of GHGs)
 - Only issue enough allowances in total as what is allowed in total under the cap
 - Ensures overall allowances match overall emissions
- Entities covered by the program
 - Must hold sufficient allowances to match the emissions for which they are responsible
 - Can reduce emissions
 - Can buy or sell allowances
- Limited number of allowances (“scarcity”) plus requirement to hold an allowance if you want to emit makes allowances valuable
- Cap and trade
 - ensures cap is met
 - provides flexibility to emitters
 - Creates price on GHGs

+ What is Allowance Distribution?

- Decision over how emissions allowances will be *initially* distributed under a cap-and-trade program
- Does **not** affect the overall environmental result (the emission reductions achieved by the program)
- Forum for dealing with equity issues in a cap-and-trade system; affects how the program's costs are distributed
 - Can be used to compensate affected firms, workers and consumers, and ease transition to a new program
- Both a challenge, and an opportunity

+ What is Allowance Distribution? (cont'd)

+ - Basic approaches:

- + - Some form of free allocation
- + - Some form of auction
- + - Hybrid (combination of both)
- + - Shift from one to another over time

+ - Regardless of which method is chosen, either free allocation or auction revenue can be used:

- + - To mitigate the economic impacts of the program (e.g., by granting allowances or tax breaks to consumers or competitively disadvantaged emitters)
- + - To drive innovation (by using allowances or revenues to fund/incentivize RD&D)

Other purposes

+ What is Allowance Value?

- + • The economic worth of the allowances
- + • Can be in the form of allowances themselves, or revenues from the sale of allowances at an auction.
- +
- +
- +
- +

Issues in Allowance Distribution

- For what purpose?
- What public policy goal do you want to achieve?
- Who do you want to help?
- Over what time period?
- How is the goal accomplished?

Things to keep in mind

- Distributing allowances is like handing out money – an inherently political task
 - Auctions face the same problem as free allocation, with revenue distribution taking the place of allowance distribution
- Think about ends first, and means second
 - Debate has thus far emphasized means over ends
- Different kinds of “costs”
 - Transition
 - Competitiveness
 - Inequities
 - Other
- To achieve purpose, the questions are:
 - Who/what entity should receive the allowances?
 - Over what time period?
 - Through what mechanism?

What purpose?

- **Share burdens and benefits equitably**
 - States/affected sectors/workers/communities/low-income consumers/new entrants
- **Address economic impacts of the policy**
 - Consumer/worker/community/industry
 - revenues/GDP
 - Transitional/long-term
- **Improve on effectiveness of policy**
 - Achieve co-benefits
 - Advance specific solutions that may not be adequately incentivized by the carbon price alone
 - Advance technology RD&D
 - Fund mitigation outside or under the cap
 - Ensure smooth-functioning market (including minimizing price spikes, encouraging early allowance price discovery)

+ What purpose? (cont'd)

- + • **Address impacts of climate change**
 - + – Fund climate adaptation
- + • **Reduce or eliminate distortions in the economy**
 - + – E.g., provide for tax cuts on labor, income and capital
- + • **Contribute to general revenues**
- + • **Other**

Midwest GHG Accord Allowance Value

- The MGGRA Advisory Group has draft recommendations on the use of allowance value
- Allowance value should be put toward climate-related purposes, not other purposes.
 - Climate-related purposes include three categories: (1) accelerating transformational investment; (2) mitigating transitional adverse impacts of the program, and (3) addressing harmful impacts due to climate change.
- Proposal to use some allowance value for *Regional Low-Carbon Technology Commercialization Fund*
 - would support a number of MGA energy and climate technology priorities, including advanced biomass conversion technologies and advanced low-carbon transportation technologies such as low-carbon fuels

Adaptation planning and actions

- **Who:**
 - State government
 - Disaster relief agencies
 - NGOs
 - Long-term planning and development agencies
- **How long:**
 - Long term
- **How:**
 - Auction revenue distribution or allowance allocation, with dispensation to sell allowances in market for revenue
 - E.g., make adaptation allocation/funds contingent on state plans

Advance climate solutions

- **What:**
 - Any low or zero-emitting technologies
 - Specific climate solutions
 - carbon capture and storage
 - demand-side energy efficiency
 - forestry
 - transportation (vehicle, fuel, VMT)
- **Who:**
 - Anyone
 - Particular kinds of actors (LSEs, ESCOs)
 - State program
- **How long:**
 - Until new solutions take hold in market
- **How:**
 - Allocate/auction for RD&D in general
 - Allocate/auction to particular actors
 - Allocate/auction to state gov't or local communities
- Note: level of specificity; which technologies to incentivize are challenging issues.

+ Demand-Side Efficiency

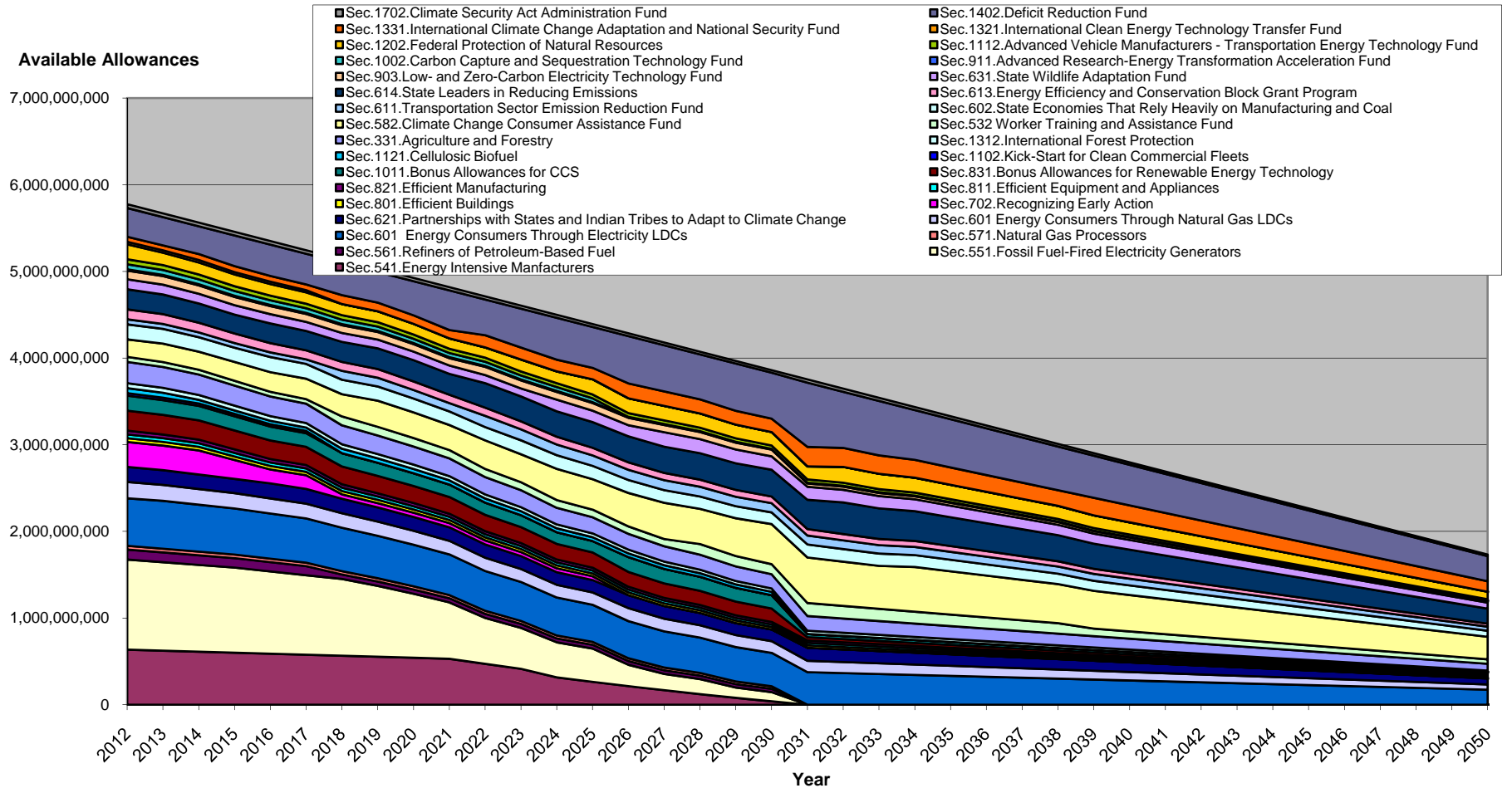
- + • For the northeast Regional Greenhouse Gas Initiative, RGGI, much attention focused on auction vs. allocation, but key innovation is using allowance value for energy efficiency
- + • RGGI modeling indicates that using allowance value for energy efficiency programs lowers cost of complying with the cap

+ Outcomes to avoid

- + • Obscuring price signal, minimizing program effectiveness
- + • Creating perverse incentives or market barriers
- + • Allocations to entities capable of passing through rising prices - windfalls

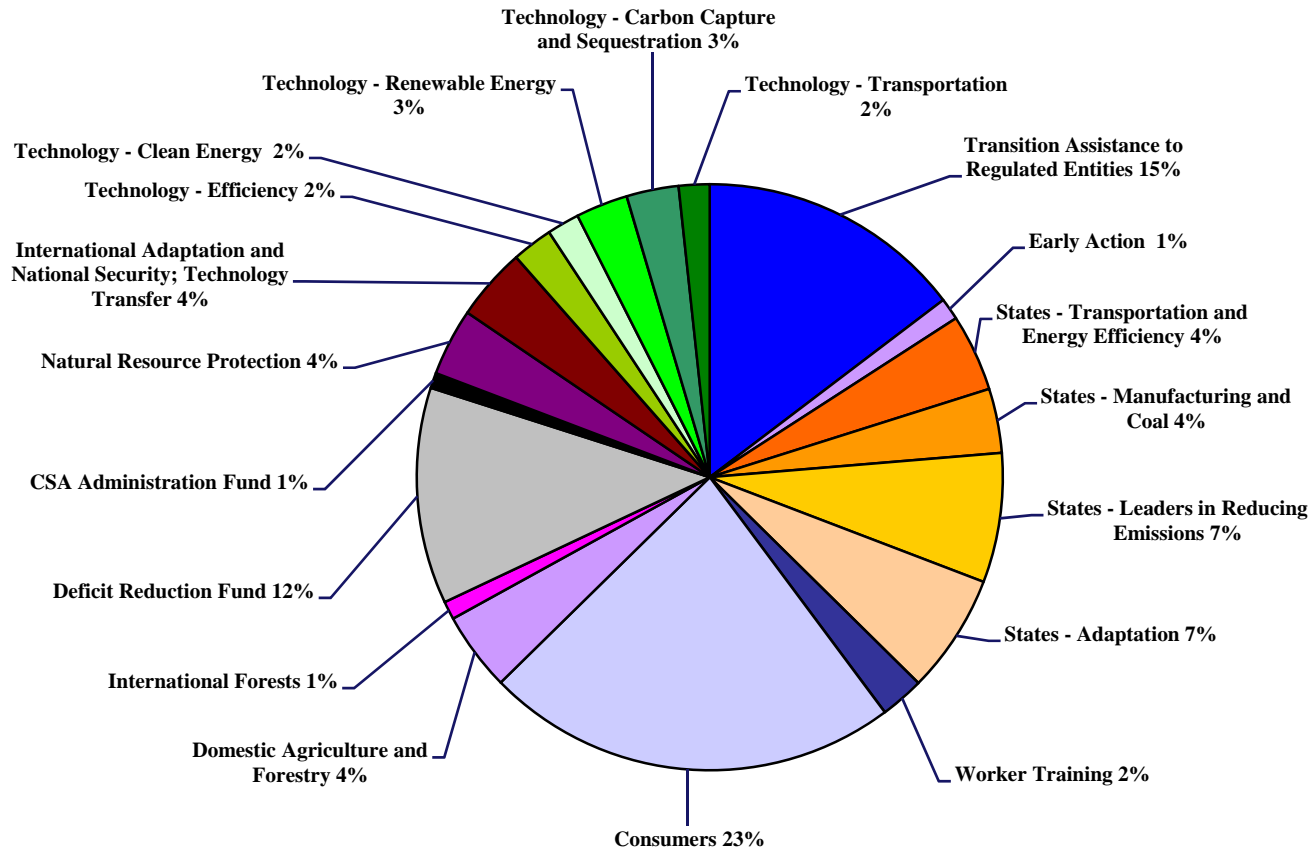
Boxer-Lieberman-Warner Distribution

Distribution of Allowances S. 3036 Boxer-Lieberman-Warner Substitute Amendment June 3, 2008



Lieberman-Warner Distribution, cont'd

S. 3036 Boxer-Lieberman-Warner Substitute Amendment Distribution of Allowances: Total by Category (Percent of total, 2012-2050)* June 3, 2008

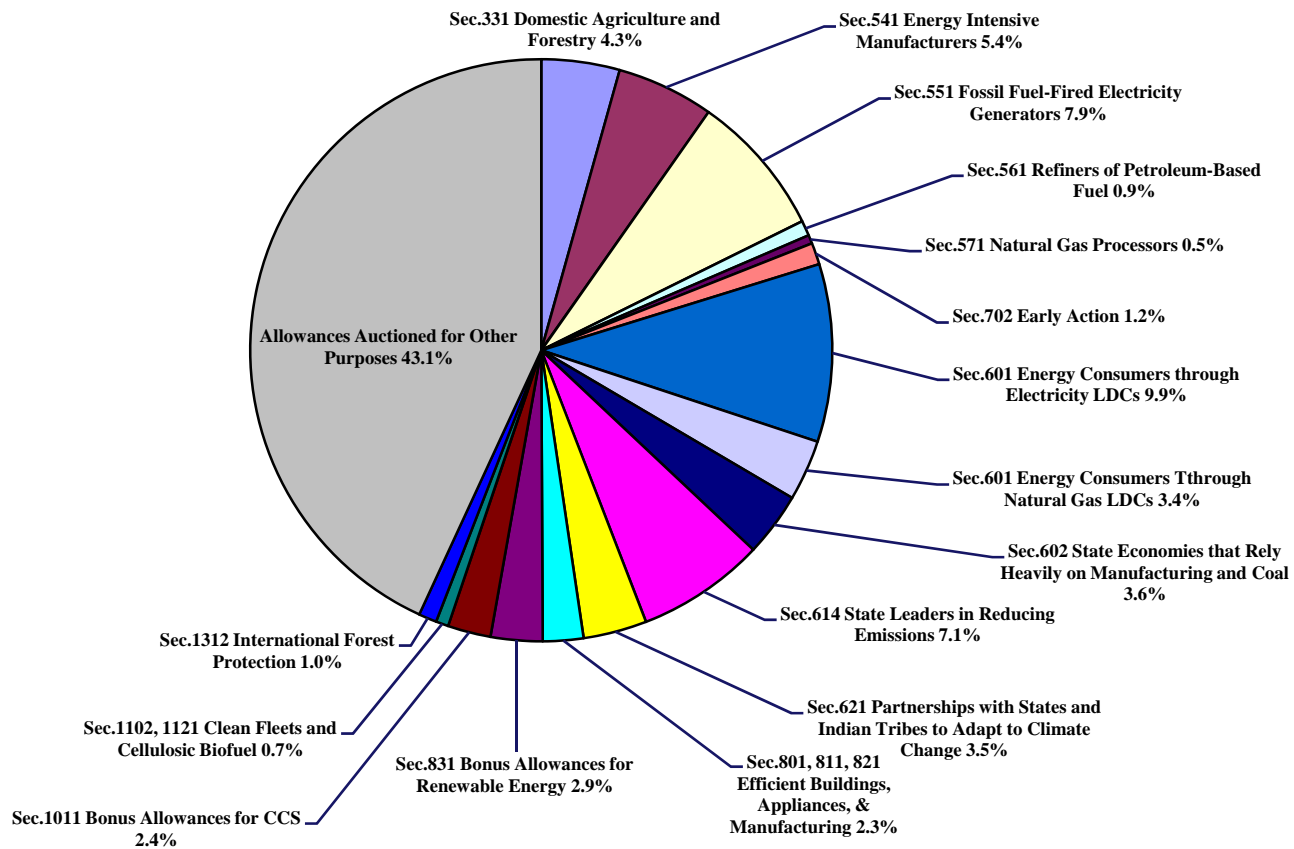


* Includes all allowances distributed over the life of the program (2012-2050) through both free distribution and auction, and grouped by category.

• www.pewclimate.org

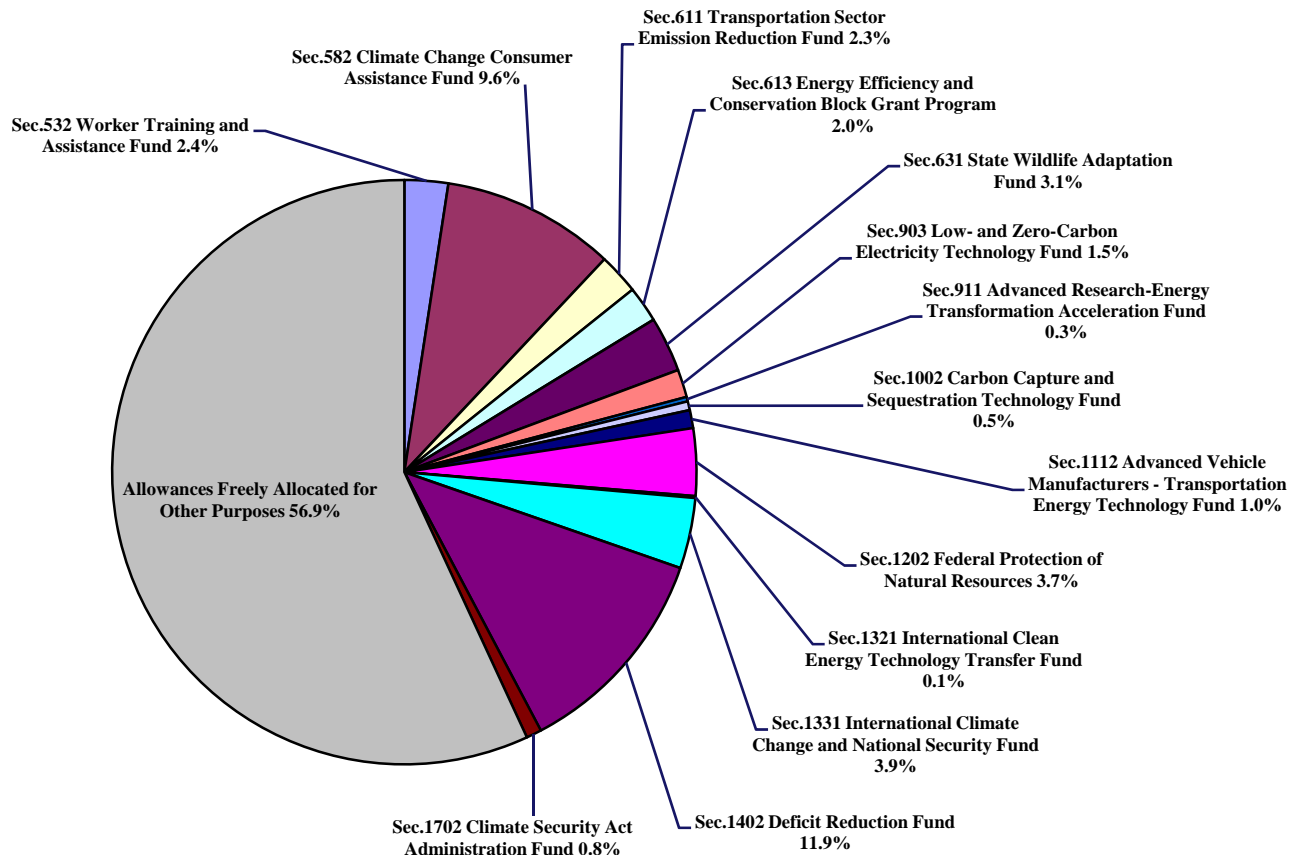
Lieberman-Warner Distribution

S. 3036 Boxer-Lieberman-Warner Substitute Amendment Distribution of Allowances: Non-Auctioned Allowances Detail (Percent of total, 2012-2050) June 3, 2008



Lieberman-Warner Distribution

S. 3036 Boxer-Lieberman-Warner Substitute Amendment Distribution of Allowances: Auctioned Allowances Detail (Percent of total, 2012-2050) June 3, 2008



California MAC Allowance Distribution Principles

- Reduces the cost of the program to consumers, especially low-income consumers
- Avoids windfall profits where such profits could occur
- Promotes investment in low-GHG technologies and fuels (including energy efficiency)
- Advances the state's broader environmental goals by ensuring that environmental benefits accrue to overburdened communities
- Mitigates economic dislocation caused by competition from firms in uncapped jurisdictions
- Avoids perverse incentives that discourage or penalize investments in low-GHG technologies and fuels (including energy efficiency)
- Provides transition assistance to displaced workers
- Helps to ensure market liquidity

+ RGGI Purposes

- + • Auction proceeds are being used to
 - + – Promote energy efficiency measures
 - + – Mitigate impacts on electricity ratepayers and low-income consumers
 - + – Promotion of renewable and/or non-emitting energy technologies
 - + – Stimulate and reward investment in development of innovative emissions abatement technologies
 - + – Program administration