

Twelve-Month Rolling Average Price of Compliance Years 2010 and 2011 NOx RTCs

January 2011 Quarterly Report to Stationary Source Committee

Summary

The twelve-month rolling average prices of Compliance Years 2010 NOx RTCs since January 2010 have been on a declining trend and have not exceeded the \$15,000 per ton threshold. The last twelve-month rolling average price for (January 2010 through December 2010) credits valid for Compliance Year 2010 is \$2,367 per ton. In comparison, the average price of Compliance Year 2009 RTCs was \$1,986 per ton for the corresponding period ending December 2009 (as reported in January 2010). For Compliance Year 2011 NOx RTCs, the twelve-month rolling average price for January 2010 through December 2010 is \$8,052. In comparison, the twelve-month rolling average of Compliance Year 2010 RTCs was \$4,780 per ton for the corresponding period ending December 30, 2009 (as reported in January 2010). This is the appropriate basis for comparison because RTC prices generally decline as the expiration date approaches. The twelve-month rolling average prices are well below the \$15,000 per ton threshold specified by Rule 2002(f)(1)(C) and, therefore, do not trigger the requirement of reporting to and potential further actions by the Governing Board.

Background

The Governing Board amended Rule 2002(f) in January 2005 to reduce the NOx RTC holdings for Compliance Year 2007 and beyond by 22.5 % over five years (11.7 % in 2007 and an additional 2.7 % in each of the years 2008 through 2011), to convert the 10.8 % adjustment applied over the years 2008 through 2011 to Non-Tradable/Non-Usable RTCs, and to issue them to the parties that held the RTCs prior to conversion. These amendments also direct the Executive Officer to calculate the twelve-month rolling average price of NOx RTCs ("rolling average price") "for all trades for the current compliance year" excluding "RTC transactions reported at no price." Furthermore, pursuant to the RTC price reporting and averaging methodology approved by the Governing Board in September 2007, "swap" transactions (the exchange of RTCs for other RTCs or for other emissions credits) are also excluded from the calculation of rolling average prices.

In the event that this rolling average price exceeds \$15,000 per ton, the Executive Officer will report the rolling average price to the Governing Board. If

the Governing Board concurs and determines that the rolling average price exceeds \$15,000 per ton, it may direct the Executive Officer to convert the annual incremental Non-Tradable/Non-Usable RTCs (2.7 %) back to active, tradable RTCs valid for the compliance year in which Cycle 1 facilities are operating at the time the finding is made. In its resolution amending Rule 2002(f), the Governing Board directed the Executive Officer to report the NOx RTC twelve-month rolling average price data to the Stationary Source Committee at least quarterly. Therefore, staff began reporting twelve-month rolling average prices of Compliance Year 2008 NOx RTCs to the Stationary Source Committee in January 2008. The January 2011 Quarterly Report includes the twelve-month rolling average prices for both Compliance Years 2010 and 2011 NOx RTCs, which are the RTCs in current use.

Analysis

Figure I presents the monthly average price of Compliance Year 2010 NOx RTCs for each month from January 2009 through December 2010, as well as the total volume of Compliance Year 2010 NOx RTCs traded in each of those months. Figure II shows the monthly average price and volume of Compliance Year 2011 NOx RTCs traded for each month from January 2010 through December 2010. The rolling average price can be calculated by dividing the total value traded during the twelve-month period by the total volume traded for the same period. Tables I and II list the monthly total volume, total value traded and the rolling average price data for Compliance Year 2010 and 2011 NOx RTCs, respectively. The rolling average price data will be updated on a monthly basis and reported to the Stationary Source Committee on a quarterly basis.

As shown in Tables I and II, the monthly rolling average prices have not exceeded the \$15,000 per ton threshold specified in Rule 2002(f). The rolling average price of Compliance Year 2010 NOx RTCs has been on a declining trend. The average price for such RTCs for January 2010 through December 2010 is \$2,367 per ton. In comparison, the average price of Compliance Year 2009 RTCs was \$1,986 per ton for the corresponding period ending December 31, 2009 (as reported in January of 2010). For Compliance Year 2011 NOx RTCs, the average price for January 2010 through December 2010 is \$8,052. In comparison, the twelve-month rolling average of Compliance Year 2010 RTCs was \$4,780 per ton for the corresponding period ending December 31, 2009 (as reported in January 2010). RTC prices generally decline as the expiration date approaches. Therefore, the appropriate comparison of the January 2010 through December 2010 average price of Compliance Year 2010 RTCs is to the January 2009 through December 2009 average price of Compliance Year 2009 RTCs. Similarly, the appropriate comparison of the January 2010 through December 2010 average price of Compliance Year 2011 RTCs is to the January 2009 through December 2009 average price of Compliance Year 2010 RTCs. Historically, Compliance Year 2011 RTCs were only traded as part of Infinite-Year Block (IYB) trades that included a block of RTCs from a starting year and all the years thereafter. The first trade of Compliance Year 2011 discrete year RTCs was not reported until September of 2010. There were only 4 trade

agreements involving Compliance Year 2011 discrete year RTC trades reported. They were all traded in a narrow price range from \$7,500 to \$8,500 per ton.

Conclusions

Based on the average prices being well below the \$15,000 per ton threshold specified in Rule 2002(f)(1)(C), it is not necessary for the Executive Officer to report the rolling average price to the Governing Board or for the Governing Board to consider reinstating the incremental NOx RTC adjustment for Compliance Years 2010 or 2011.

Figure I

Monthly Average Price Data for Compliance Year 2010 NOx RTCs Traded – January 2009 through December 2010.



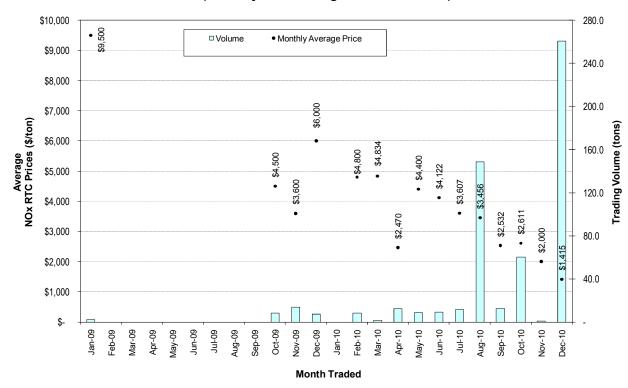


Table I

Twelve-Month Rolling Average Price Data for Compliance Year 2010 NOx RTCs

Twelve-Month Rolling Average Price Data for Compliance Year 2010 NOx RTC (January 2009 - December 2010)							
Reporting Month	12-Month Period	Total Volume Traded with Price During Past 12-month (tons)		Rolling Average Price (\$/ton)			
Jan-10	Jan 09 - Dec 09	31.7	\$151,390	\$4,780			
Feb-10	Feb 09 - Jan 10	29.7	\$132,390	\$4,462			
Mar-10	Mar 09 - Feb 10	37.7	\$170,790	\$4,534			
Apr-10	Apr 09 - Mar 10	38.7	\$175,733	\$4,542			
May-10	May 09 - Apr 10	51.1	\$206,427	\$4,038			
Jun-10	June 09 - May 10	59.7	\$244,047	\$4,090			
Jul-10	July 09 - June 10	68.6	\$280,935	\$4,094			
Aug-10	Aug 09 - July 10	79.9	\$321,502	\$4,025			
Sep-10	Sep 09 - Aug 10	228.5	\$835,056	\$3,655			
Oct-10	Oct 09 - Sep10	241.0	\$866,819	\$3,596			
Nov-10	Nov 09 - Oct 10	293.0	\$986,731	\$3,367			
Dec-10	Dec 09 - Nov 10	280.3	\$939,231	\$3,351			
Jan-11	Jan 10 - Dec 10	533.6	\$1,263,221	\$2,367			

Monthly Average Price Data for Compliance Year 2011 NOx RTCs Traded – January 2010 through December 2010

Figure II



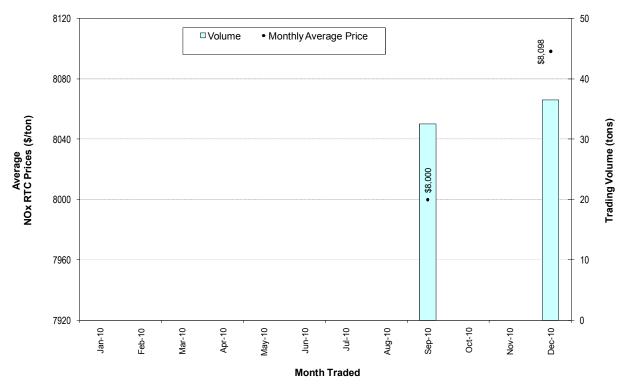


Table II

Twelve-Month Rolling Average Price Data for Compliance Year 2011 NOx RTCs

Twelve-Month Rolling Average Price Data for Compliance Year 2011 NOx RTC (January 2010 - December 2010)						
Reporting Month	12-Month Period	Total Volume Traded with Price During Past 12- month (tons)	Total Value Traded During Past 12- month	Rolling Average Price (\$/ton)		
Jan-11	Jan 10 - Dec 10	69.0	\$555,180	\$8,052		