

Emission projections 2008-2012 versus NAPs II¹

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We compare the national allocation plans, proposed and submitted by EU member states as of October 2006, with our estimations for CO₂ emissions by the installations covered by these NAPs. The collective allocations proposed under Phase II NAPs exceed the historic trend of emissions extrapolated forward. Using our projections we find, depending on uncertainty in fuel prices, economic growth rates, performance of the non-power sector and CDM/JI availability, a 15% chance of a 'dead market' with emissions below cap even at zero prices. With an expected inflow of committed CDM/JI credits of 100 MtCO₂/year allowance supply will exceed demand in 50% of cases without any carbon price, and in 80% of our 20€tCO₂ scenarios. The proposed Phase II NAPs would result in low prices and only small volumes of CDM/JI would enter the EU ETS. CDM/JI would almost exclusively be public sector funded, placing the cost of Kyoto compliance entirely upon government

Key Words: Emission trading, Allocation Plan, Europe, Projections

JEL classification: C53, E37, L94, Q50

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I. Introduction

This paper projects the balance of supply and demand of allowances to emit CO₂ under the European emission trading scheme (EU ETS) for the period 2008-2012. This balance will determine the scarcity and thus allowance price during this period. Our aim is thus to assess the collective implications of these plans for the operation of the EU ETS in Phase II, if they were to be approved.

Installations covered by scheme have to provide CO₂ allowances for every ton of CO₂ they emit. This forms the demand for allowances under the scheme. The supply to the market follows from tradable allowances allocated to existing or new installations or auctioned by governments as defined in the national allocation plans. As of early November, almost all Member States had plans either submitted for approval to the European Commission, or published for consultation. The linking directive allows for some additional allowance supply to the EU-ETS market from project credits under the Clean Development Mechanism or Joint Implementation projects. To the extent that allowances from the period 2008-2012 are banked to future periods, this would create additional demand. It seems rather certain that no allowances from the period post 2012 can be borrowed to cover emissions in the period 2008-2012, so no additional supply from banking is expected.

To anticipate this impact we therefore first collated the information in the NAPs – itself a complex exercise given some of the special provisions. Then we made different projections for the possible inflow of allowances from the CDM and JI project mechanisms. The main contribution of the paper is a projection of the CO₂ emissions from installations covered by the European Emission trading scheme. We first set the context by comparing allocations against extrapolation of past trends, and explore the implications of different price and growth scenarios using detailed model analyses. In projecting these emissions we started from the verified emission data from the year 2005. For the non-power sector we used two different modelling approaches to project the anticipated emissions in the period 2008-2012 on a sectoral level for each country. In the power sector emissions are very sensitive to fuel and CO₂ prices. Therefore we apply a detailed power sector model of ICF International to project country level emissions.

One inherent uncertainty in this field is caused by limited or restricted data availability. For three member states only limited information about verified emissions for the year 2005 was available. This was the base year for our projections. If aggregate emissions of installations covered by ETS in these member states were below our assumptions, then the gap between projected emissions and the cap could be bigger (and vice versa). In section VI we provide a more detailed discussion of the sensitivity of our modelling to various parameters and model choices.

We projected emissions and assessed the cap on a national level. We also verified our power sector model, the assumptions on the cap and the split between sectors on the

national level. But we did not have the resources to comprehensively compare our projections against all national projections.

II. Methodology and assumptions

To project future CO₂ emissions, we treat the power sector separately from other sectors covered by the ETS. For the power sector we examine emissions using the Integrated Planning Model (IPM[®]) of ICF International which simulates every European power station and investment decisions in new power stations. For the remaining sectors we use two approaches. First, we start from the verified emissions from 2005, adjust for the coverage of the ETS and then apply sector specific growth rates from a recent DTI BAU study combined with country specific CO₂ growth rates from OECD projections. The second approach to project emissions of the non-power sectors involves applying country and sector specific CO₂ growth rates as determined by the E3ME model of Cambridge Econometrics and calibrated for the Matisse FP6 project assuming CO₂ prices around 20 €/tCO₂. The detailed assumptions and our treatment of missing data are explained in Appendix I and II.

To explore sensitivity to prices, we use four different fuel price assumptions from a recent UK Department of Trade and Industry study (DTI 2006c) (Appendix III).

To determine the total cap, we use the publicly available data from NAPs, assuming in the following figures that all new entrant reserves will be issued. Some NAPs² envisage that New Entrant Reserves will be cancelled if not issued to new entrants. Without any new build in these countries, the total EU cap would be reduced by 20 Mt CO₂/year.

We furthermore assume an inflow of allowances into ETS from CDM and JI projects. Following a more detailed discussion in Grubb and Neuhoff (2006), we assume between 0 and 1000 MtCO₂ international project credits and allowances could be available to enter the ETS during the period 2008-2012. The upper level is one third lower than the total projected availability of CDM and JI for Europe, assuming that at least some of the inflow would be taken by government inflow in all cases; it is also roughly consistent with the ‘supplementarity’ constraint that many MS have built into their plans, representing even at this maximum level an inflow of less than 10% of allocated allowances. Table 1 gives the range that we assume for cap and inflow (Appendix IV).

CAP	2074
CAP with NER	2178
CAP with NER, high CDM/JI inflow	2378

Table 1 depicts our estimations on CAP including inflows from JI and CDM projects (MtCO₂/year).

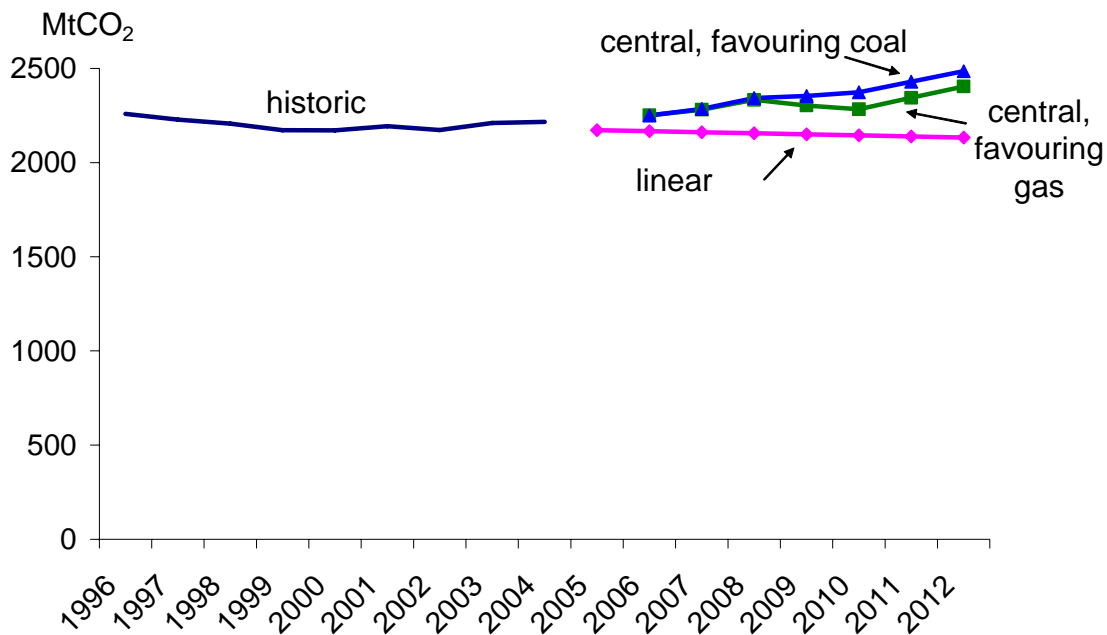
² The NAPs specify that Cyprus, Denmark, Lithuania, Latvia, Malta, Portugal should not sell the excess NER back to the market. In the French NAP it is not decided whether to cancel the excess NER or auction it, but for the purpose of calculating the maximum possible reduction of the Cap we assume that it will be cancelled.

III. Emission projections in relation to historic trend

To verify our emission projections we first compared them to historic emissions from 1990-2004 using data from the European Community GHG Inventory (EEA 2006) (Figures 1 and 2). As the Inventory only provides data on the total national GHG emissions, for the purposes of these figures we assume that the share of emissions associated with ETS stays constant (Georgopoulou et al. 2005). Applying a linear trend to this historic emission from 1990-2004 (later start for accession countries), we extrapolated the BAU development of emissions for 2005-2012 (Appendix V).

Figure 1 and Figure 2 illustrate that the emissions under this linear trend are lower than projected in the two central fuel price scenarios. The fundamental reasons why emissions resume growth in the modeling projections, after a decade of decline or stability, is probably due to an assumed slowdown in the rate of energy efficiency improvements and a slowdown in the historic shift from coal towards natural gas, in the light of higher natural gas prices. We do however note a general tendency that models have previously projected emission growth that has not materialized. As our model approach is also likely to underestimate emission reductions from unanticipated technological, institutional and behavioral changes, our results may be conservative – the excess allocation that we find under the currently envisaged NAPIIs might be even higher in practice.

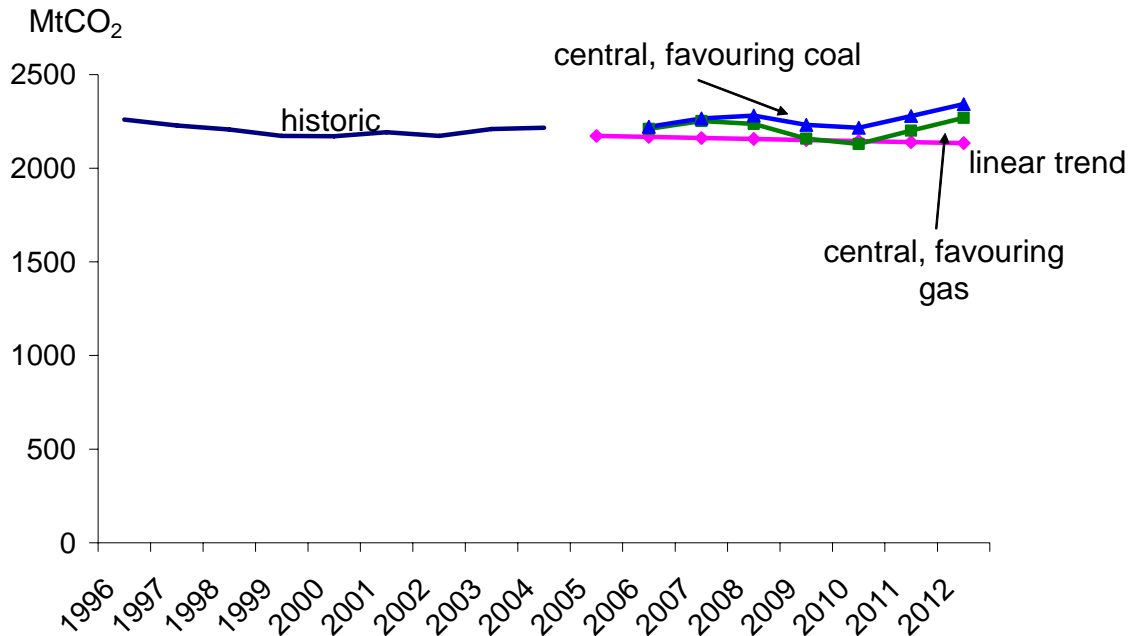
To set this in the context of Phase II allocations, the total Phase II CAP with NER implied in the present NAPs is slightly above the average emissions levels over the past 10 years.



Source: Neuhoff, Ferrario, Grubb, Gabel, Keats (Sept 2006)

Figure 1 Linear trend of ETS emissions compared to simulation results for the case of 0 CO₂ price and central fuel price assumptions.

Figure 2 illustrates that, with a price of €20/tCO₂, emissions from the ETS sectors are projected to be roughly stable at current levels, still slightly above the historic trend.



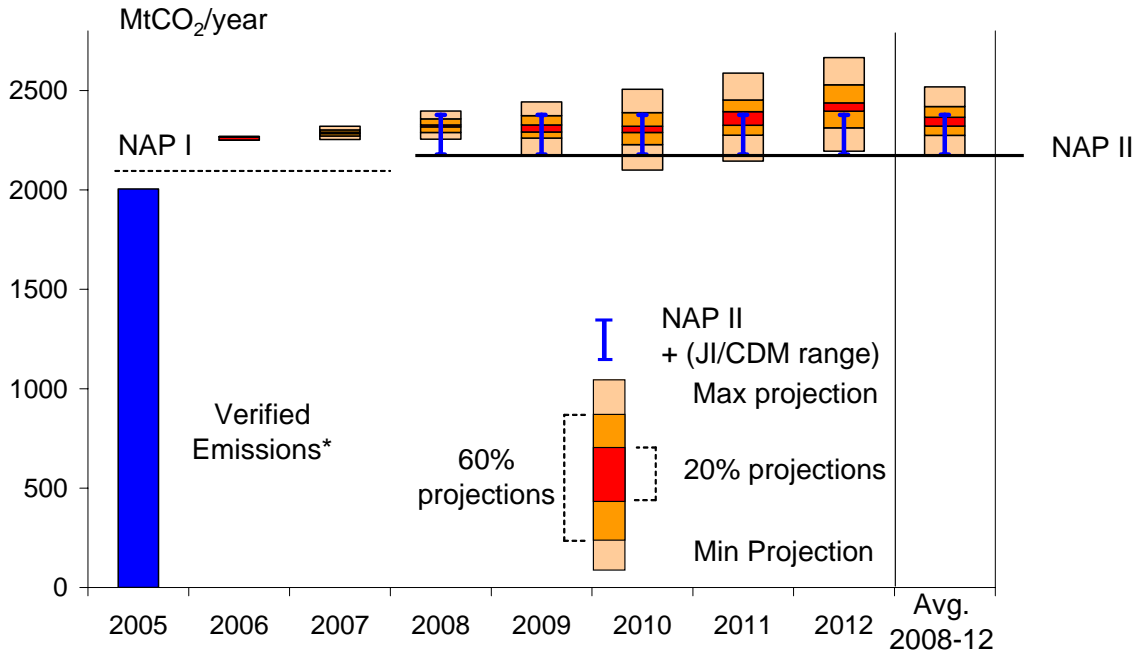
Source: Neuhoff, Ferrario, Grubb, Gabel, Keats (Sept 2006)

Figure 2 Linear trend of ETS emissions compared to simulation results for the case of 20 €/tCO₂ price and central fuel price assumptions.

IV. Numerical results from simulations under uncertainty

Figure 3 compares the total NAP II allocation (the horizontal line spanning 2008-12) against most recent emissions, the Phase I cap, and our range of projections for emissions over the period if there were no EU ETS. We assume four different fuel price scenarios, three different economic growth rates and apply two different models for the non-power sector. Thus the projection range depicts the outcome of 24 different model scenarios.

With the blue vertical bars we also show the range of potential inflow from JI and CDM credits into ETS.



Source: Neuhoff, Ferrario, Grubb, Gabel, Keats (Sept 2006)

Figure 3 Projected CO₂ emissions versus Cap for the BAU (assuming zero CO₂ price)

Note that the Phase I cap was significantly above the 2005 verified emissions, and the NAP II allocations in turn represent a significant increase over Phase I.

Our model estimates of emissions for 2006 exceed the 2005 verified emissions, for four reasons. First, in the electricity modeling we do not reflect that some gas generation is operated despite being more expensive than coal, because it is supplied under take-or-pay gas contracts. This would have decreased CO₂ emissions by 100 Mt. Second, the electricity model calculates aggregate CO₂ emissions that exceed verified emissions by 25 Mt. Third, with GDP growth emissions of the non-power sector are expected to grow by 25 Mt. Fourth, 63.1 Mt of additional installations are covered under NAP II, that either opted out of NAP I, or where the coverage is extended.

The results for 2008-12 illustrate that emission projections are subject to considerable uncertainty. Across our range of assumptions, the Figure illustrates the distribution in term of five probability bands, with the central red illustrating the central 20% of scenario outcomes. The results show that even with a ‘zero carbon price’ (a ‘no EU ETS’ scenario):

- without any inflow of CDM and JI credits, allowance supply will exceed demand in 20% of our scenarios. In other words, based on the current NAPs and a range of other input assumptions, there is a one-in-five risk that the EU ETS would be unable to sustain any carbon market or incentive to abate, at home or abroad. We could only expect a positive price if banking moves a significant share of the allowances towards post-2012.

- if inflows from JI and CDM projects are high (200 MtCO₂/year), 80% of the projections result in excess supply. Obviously, there is a certain paradox in a combination of high emission credit imports with an overall surplus market, but it illustrates that current Phase II allocations are extremely unlikely to support private purchase of emission credits on the scale that suppliers may be hoping for even at very low carbon prices.

Figure 4 illustrates the equivalent results if the power sector adjusts investment and operational decisions to reflect a Carbon price of 20 €/tCO₂. Obviously, this reduces the total emissions in our 24 model scenarios, as depicted.

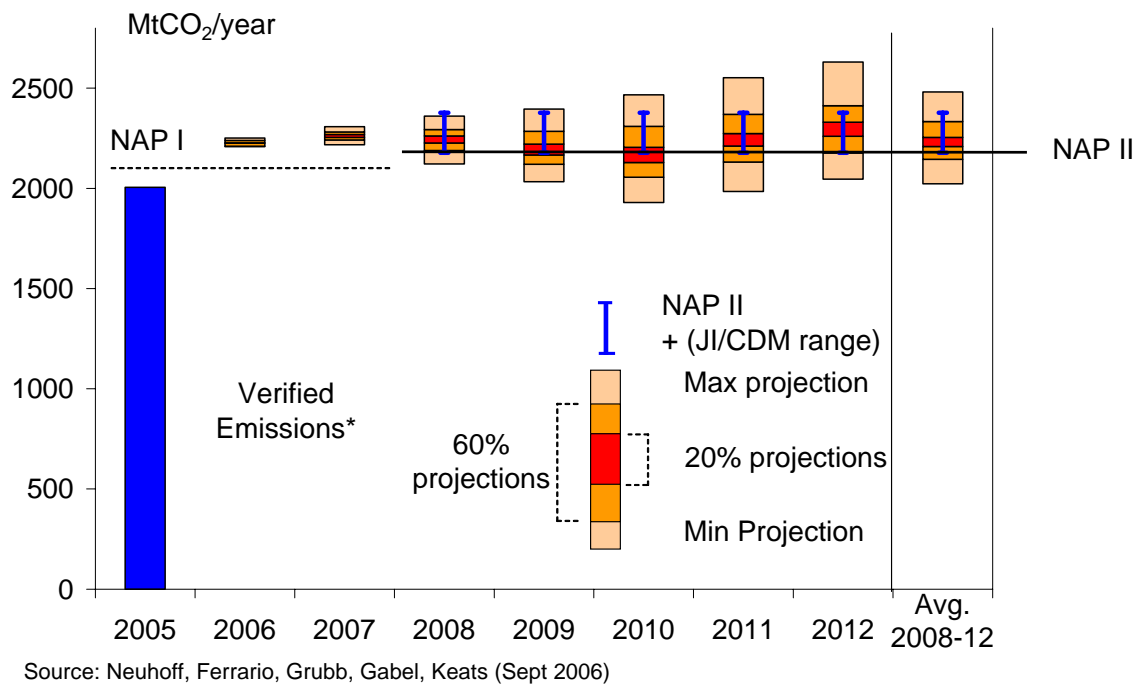


Figure 4 Projected emissions and Cap, when the power sector is exposed to 20 €/tCO₂ price.

The Figure illustrates that:

- in 50% of the scenarios assuming an allowance price of 20 €/tCO₂, emissions would fall below the European cap even without *any* inflows of JI and CDM credits into the EU ETS.
- At the high level of credit inflow, the probability of sustaining a 20€/t price is very small, and even on our central case (100MtC/yr), there is only a 20% chance of the market sustaining a price of €20/t.

This suggests that the currently published allocation levels of NAPs II are simply not consistent with sustaining CO₂ prices at any thing like the levels seen to date.

The level of the CO₂ emissions in this projection suggests that if the European countries want to ensure CO₂ prices close to 20 €/tCO₂ then they have to significantly reduce the aggregated EU Cap. The implication based on our projections is that if a 200Mt

tightening were associated with a similar level of JI/CDM imports (200Mt/yr), there would then be a roughly 50% chance of the market sustaining a price of around €20/t – before taking account of responses outside the power sector.

V. Discussion

V a. Implications for the NAP approval process

Our analysis implies that the currently proposed allocations are unlikely to support a viable CO₂ market. If other analyses confirm this, this conclusion obviously puts a spotlight on the approval process. The Commission has to evaluate each NAP on its own merits, in relation to the criteria laid out in the Directive. Nevertheless, given the relative ambition of some of the NAPs (eg. Spain, Italy, UK) our collective result must imply that many other NAPs contain overallocation based on emission projections which, at least when considered collectively, are implausible. This would contravene relevant terms of the Directive.

A further basis on which the Commission might critically assess the national allocation plans are state aid considerations. Johnstoen (2006) argues that free allowance allocation does constitute state aid, which has to be notified according to the Directive. One relevant provision for the assessment of such state aid could be the proportionality principle – the benefits from the free allocation should be proportional to the transition cost for companies from the introduction of emission trading.

Moreover, the weak allocations raise questions about the consistency of plans with national Kyoto targets, which is another criteria relevant to Commission assessment. In principle, countries could ‘fill the gap’ with purchases of JI/CDM, to which we now turn.

V b. Implications for CDM / JI credits and government purchase

Weak allocations in the EU ETS do not necessarily imply a weak market for CDM/JI credits. As long as countries comply with Kyoto, the total demand for CDM/JI (or equivalent transfers of AAUs under Green Investment Schemes – an option not open to ETS private sector participants) is set by the difference between national emissions and Kyoto targets over 2008-12. The real implication of weak EU ETS allocations is what it does to the cost of compliance to governments, specifically finance ministries and taxpayers, through three factors:

- *Substitution*: more allocations to ETS sectors mean the private sector will have less need to purchase CDM/JI credits that would contribute to national compliance; governments must pay for these directly.
- *Increased total need*: a weak EU ETS price means that EU ETS sectors undertake less abatement, resulting in higher national emissions, and in aggregate a greater *total* need for CDM/JI credits. National governments could also decide to acquire additional AAUs from countries like Russia and the Ukraine. It is currently

unclear to what extent that is politically acceptable and what level of ‘greening’ would be desired.

- *Price escalation*: the greater aggregate demand for CDM/JI credits might reasonably be assumed to have some impact on the overall CDM/JI market, increasing the price.

In short, the excessive EU ETS allocations mean that governments have to take up the slack, and substitute for less domestic abatement by funding additional abatement abroad at a higher unit cost to the taxpayer. If the price of CDM/JI credits exceeds the EU ETS price, the Kyoto credits market will become a largely public-sector funded operation, rather than leveraging the private investment that many had originally envisaged.

The excessive EU ETS allocation would thus be in contrast to a desirable emission pathway. As it is frequently assumed that the installations of the covered sector, especially the power sector, have easier accessible emission reduction options one could expect that the ETS share of the national emission budget will decline, rather than increase, as some current plans seem to envisage.

V c. Implications for auctioning and other mechanisms

As noted, if the EU ETS is to be an effective market during the Kyoto period, the process from hereon must reduce the currently proposed volume of total free allocations, probably by a couple of hundred MtCO₂ per year. However, our analysis has emphasized the irreducible uncertainty associated with emission projections. This suggests that Member States should consider carefully measures to increase price stability and thus provide investment certainty.

One option would be increased use of auctions. Auctions in themselves could in principle provide a source of revenue for government purchase of Kyoto credits. In addition, if all MS were to auction allowances within the 10% limit of the Directive (200 Mt/yr) and the auctions were implemented with a price floor, then this would cover the range of uncertainty in the projections (Hepburn e.a. 2006). This could ensure that in the case of low emissions a reduced inflow from the auctions would maintain prices, without distorting the demand/supply balance in the case of higher demand.

Banking of allowances to the period post-2012 could also help to support the price, if participants believe that the future allowance price will be higher. Banking has worked effectively in SO₂ and NO_x programs in the US (Ellerman 2004). However, the same mechanism in the EU ETS would be subject to a high degree of uncertainty due to its iterative allocation approach and the complexity of post-2012 negotiations. These added uncertainties could subject the EU ETS to greater price volatility, and may thus reduce the effectiveness of banking as a mechanism to reduce investment risk.³

³ Note also that in the longer term governments could issue option contracts for CO₂, also ensuring a price floor (Ismer and Neuhoff 2006[0]). European governments could thus guarantee buying back allowances until the scarcity of allowances is increased to the strike price of the option contracts.

VI. Caveats and Sensitivities

It is important to note that this study does not calculate the impact of CO₂ prices on the CO₂ emissions of the non-power sector. It relies on (a) a DTI study, which assumes CO₂ emissions under 0 CO₂ price and then gives aggregate figures on the price response of the covered sector to allowance prices, and (b) the E3ME study, which assumes a positive allowance price (increasing from 18 to 25 €/tCO₂ during phase II). Using data from the E3ME study, our emission projections for the non-power ETS sectors decrease by 75 Mt relative to our simulations based on DTI data. As both approaches differ in various dimensions, it is not clear to what extent this difference can be attributed to the emission reductions or due to CO₂ prices. Therefore we did not differentiate between both approaches, and depicted the results both for the 0 and 20 €/tCO₂ case as a component of the prediction uncertainty.

Table 2 illustrates how different assumptions affect the projected CO₂ emissions from the EU ETS sectors. As basis for the previous two Figures we had calculated the impact of combining all these scenarios.

(Average 2008-12)	0 CO ₂ price		20 €/tCO ₂	
	MtCO ₂ /year	Change	MtCO ₂ /year	change
Central fuel price, favouring gas, DTI	2352		2218	
Matisse study with E3ME for non power	2277	-3,2%	2143	-3,4%
Fuel price scenario central favouring coal	2416	2,7%	2289	3,2%
Fuel price scenario low fuel price	2316	-1,5%	2160	-2,6%
Fuel price scenario high fuel price	2444	3,9%	2407	8,5%
GDP growth 0.75% higher/a (= CO ₂ growth)	2424	3,1%	2286	3,0%
GDP growth 0.75% lower/a (= CO ₂ growth)	2282	-3,0%	2152	-3,0%

Table 2 Sensitivity of projected CO₂ emissions to model parameters

VII Conclusion

We combined a detailed power sector model for all European countries with two approaches to project emissions of the non power emissions covered by ETS, and simulated CO₂ emissions until 2012. We used the data from currently available national allocation plans and extrapolated to the outstanding plans to determine the currently envisaged emission cap under ETS for the period 2008-2012. We also made assumptions about the possible inflows of JI and CDM project credits into the ETS.

The result suggests that it is possible that emissions will fall short of the allowances in the scheme in a scenario where we assumed 0 CO₂ prices and it is very likely that emissions will fall short of allowances in the scheme in a scenario with 20 Euro t/CO₂. Thus very low CO₂ prices are likely to result from the currently proposed second phase NAPs. In the current arrangement only extensive banking into the period post 2012 could ensure a significant positive CO₂ price. However, given the uncertainty about post 2012 arrangements such banking is unlikely to attribute very high values to allowances, and

given the complexity of political negotiations, such banking is likely to introduce large volatilities in the prices of ETS allowances throughout the period 2008-2012. Hence the future of EU ETS risks being heavily undermined by second phase NAPs submitted to the European Commission, unless decisions are made to amend proposals in line with a tighter overall volume of allowance allocation.

The range of CO₂ emissions we simulated for the year 2008-2012 illustrates how sensitive emissions can be to changing GDP growth rates, fuel prices and to energy intensity and technology development in all sectors. To increase the predictability of CO₂ prices in the light of this uncertainty one might consider using the flexibility of the EU Directive and lessens free allocation to sectors that are not exposed to competition outside of the EU (e.g. power sector). The allowances not issued for free could then be auctioned, e.g. 10% of the allowances issued per country. If a harmonised European price floor were to be used in these auctions, then this could help to manage the volatility inherent in any system in which cutbacks are modest compared to the intrinsic uncertainties in emission trends, and create confidence that the price will not drop below the price floor. This would facilitate investment in low Carbon technologies and energy efficiency.

Appendix I Verified Emissions

We started with verified emission data (EU Commission 2006a, 27.9.2006) differentiated into iron and steel, cement, lime, glass, pulp and paper, ceramics, others and primary aluminium. Based on WIFO (2006) we separated the classification combustion installations into power and non-power related combustion installations. Since we could not allocate the non-power combustion installations to specific sectors we included them in the category 'others'.

For Poland only data on 331 installations was available as of 27th of September 2006, representing allocated allowances for 115.2 MtCO₂ out of a total NAP I of 239.1 MtCO₂. We assumed that the installations not reported in the CITL will have the same ratio to allocated emissions as the installations for which already reported data is available. Thus we assumed 189.0 MtCO₂ emissions for Polish installations covered by ETS in 2005 (implying a total national surplus of 50.1 MtCO₂). In our simulations of the European power sector, we calculated 132 MtCO₂ emissions for Polish power installations covered by ETS, and used this figure to separate between power and non-power related emissions.

For Cyprus and Malta no data was available and we assumed that they have the same ratio between verified emissions and NAP I allocation as the Member States for which full data was available. We did not have data available that allowed us for a differentiation between power and non-power installations and thus applied general emission growth trend to all emissions.

We added to these verified emissions the volume of new installations covered under NAP II that either opted out or were not covered under NAP I (5.3 in Belgium, 11 Mt in Germany, 32 Mt in the UK, 6.6 MtCO₂ in Netherlands, 5.5 in France, 0.7 in Portugal, 2 in Sweden).

Appendix II Projections for non-power sector

To project the CO₂ emissions for the non-power sector, we first used an approach based on a recent DTI study (2006 a,b) and then an approach based on a European model of Cambridge Econometrics.

For the first approach we applied to the verified emissions per sector and country the sector specific emission growth rates used by the UK DTI (2006 a,b), scaled by the differences in the expected national growth rates (Table 3). For example the Spanish GDP is expected to grow 0.6 % faster in 2006 than the UK GDP, thus we also assumed that emissions across the sectors increase by 0.6% faster in Spain than in the UK. GDP growth projections for the period 2006-2007 are based on Eurostat (2006) and for the period 2008-2012 based on OECD (2006) and IMF (2006).

The application of the DTI model outside of the UK makes the implicit assumption that the technological mix within a sector is roughly comparable across Europe. This is

certainly a strong assumption, but we have no data available that allows us to assess what type of bias it introduces. By correcting for the relative size of different sectors we intent to address the main concern of any such transfer – a different sectoral composition between countries.

	2006	2007	2008-2012
AT	2,5%	2,2%	2,4%
BE	2,3%	2,1%	1,9%
CY	3,8%	3,8%	2,8%
CZ	5,3%	4,7%	3,8%
DE	1,7%	1,0%	2,0%
DK	3,2%	2,3%	1,1%
EE	8,9%	7,9%	4,6%
ES	3,1%	2,8%	2,5%
FI	3,6%	2,9%	1,5%
FR	1,9%	2,0%	2,1%
GR	3,5%	3,4%	3,1%
HU	4,6%	4,2%	3,0%
IE	4,9%	5,1%	3,6%
IT	1,3%	1,2%	1,4%
LT	6,5%	6,2%	4,6%
LU	4,4%	4,5%	4,0%
LV	8,5%	7,6%	4,6%
MT	1,7%	1,9%	4,6%
NL	2,6%	2,6%	2,1%
PL	4,5%	4,6%	4,5%
PT	0,9%	1,1%	2,0%
SE	3,4%	3,0%	1,8%
SI	4,3%	4,1%	4,6%
SK	6,1%	6,5%	5,5%
UK	2,4%	2,8%	2,5%

Sources:

2006-2007 data from Eurostat (2006)

2008-2012 data from OECD (2006), except for CY, EE, LT, LV, MT and SI from IMF (2006).

Table 3 Assumed GDP growth rates.

The second approach uses sector and country specific growth rate computed from Cambridge Econometrics modelling. They represent those of the baseline scenario for the FP6 project Matisse using the E3ME model, covering the 2005-2010 period (Matisse 2006). For the purpose of this paper we assume that the sector specific growth rates are constant in 2011 and 2012. As the definitions of sectors under E3ME did not exactly match the classifications of verified emissions, we matched these sectors as described in Table 4.

CITL	Matisse/E3ME
Refineries	2 - Other energy own use and transformation
Cement and Lime	6 - Non metallic nes
Ceramics	6 - Non metallic nes
Glass	6 - Non metallic nes
Pulp and Paper	10 - Pulp and Paper
Iron and Steel	3 - Iron and Steel
Other	12 - Other industry

Table 4 Mapping of E3ME model results to classification used for verified emissions

Appendix III Projections for power sector

For our analysis of the European power sector, we use the Integrated Planning Model (IPM[®]) developed by ICF International. The Integrated Planning Model (IPM[®]) is a linear programming model that selects generating and investment options to meet overall electricity demand today and on an ongoing and forward looking basis over the chosen planning horizon at minimum cost. Further details about the model are available from the EPA website (<http://www.epa.gov/airmarkets/epa-ipm/>).

Table 5 gives the fuel price assumptions for which we followed the July study of the Department of Trade and Industry in the UK (DTI 2006c). These prices were also applied to other European countries, correcting for location/transport costs and adjusting the differing intra annual price profile for gas between the UK and continental Europe. Demand projections are based on the UCTE forecasts for all Member States except the UK (based on DTI projections).

	Central - Favouring GAS			Central - Favouring COAL		
	Oil (\$/bbl)	Gas (p/therm)	Coal (£/t)	Oil (\$/bbl)	Gas (p/therm)	Coal (£/t)
2005	55	41	33,6	55	41	33,6
2010	40	25,8	27,2	40	33,5	27,2
2015	42,5	27,3	26,1	42,5	35	26,1
2020	45	28,8	25	45	36,5	25
	High prices			Low prices		
	Oil (\$/bbl)	Gas (p/therm)	Coal (£/t)	Oil (\$/bbl)	Gas (p/therm)	Coal (£/t)
2005	55	41	33,6	55	41	33,6
2010	67	49,9	36,5	20	18	19
2015	69,5	51,4	36,5	20	19,5	16,8
2020	72	53	36,5	20	21	14,6

Table 5 Fossil fuel price assumptions from DTI (2006c)

We assumed that the EU renewables target is satisfied. The model calculates the emissions for all power stations. For one central fuel price scenario we determined the volume of emissions that results from installations with less than 20 MW thermal

capacity (56.4 MtCO₂/year). As these installations are mainly heat driven we assumed the emissions to stay constant across the time frame considered and across fuel price scenarios.

For the simulations, we constrained newbuild CCGT and coal plants to those already commissioned until 2013. The only plants coming on before 2013 are firm builds, unplanned CT units and unplanned wind installations (this reflects the idea that CCGT or coal plant to become operational by 2012 already have to be commissioned today). This might understate the potential for emissions reductions from a more rapid shift to gas through additional investment in gas generation. However, given that we already observe an increase of gas demand for power generation in Europe in the low fuel price scenario with ETS price (from 6700 TBtu to 11300 TBtu coverage exceeding ETS), it is reasonable to assume caution with additional shifts to gas generation.

Table 6 presents the aggregate CO₂ emissions for European emissions, using the DTI based projection on emissions of the non-power sector.

CO ₂ price	Fossil fuel price scenario	2006	2007	2008	2009	2010	2011	2012
0 €/tCO ₂	Central - Fav GAS	2268	2299	2351	2322	2301	2363	2423
	Central - Fav COAL	2268	2303	2361	2373	2392	2448	2505
	High Prices	2268	2301	2355	2389	2433	2493	2549
	Low Prices	2269	2302	2352	2286	2240	2314	2388
20 €/tCO ₂	Central - Fav GAS	2228	2269	2255	2177	2149	2220	2289
	Central - Fav COAL	2239	2283	2299	2251	2236	2298	2362
	High Prices	2251	2290	2325	2342	2394	2459	2515
	Low Prices	2225	2263	2216	2140	2064	2147	2232
20 €/tCO ₂	Central – Fav gas, minimum gas constraint	2128						

Table 6 EU emission projections for power sector using IPM[®] model (MtCO₂) and based on DTI sector projections for non-power sector

When comparing the model results in 2006 with the 2005 verified power sector emissions we observed that we exceeded these emissions. This is what we expected as many gas power stations have long-term take-or-pay contracts and were thus operating despite the high 2005 gas prices. To test our model, we implemented a minimum run requirement on gas. On a country by country level the same amount of gas had to be used in the power sector in the 2006 as observed in 2003. Using this constraint our 2006 simulated data for all countries excluding Poland, Malta and Cyprus exceeded the verified emission data for the power sector of these countries by only 2%. Most deviations on a per country level could be explained by the specific climatic conditions in the year 2005. Thus we were content to use the model for emission projections.

For our long-term projections we did not apply the minimum gas consumption constraint. We assume that the take-or-pay contracts for gas that we reflected in this constraint will be resolved as part of the European liberalisation or that new gas powered stations are exposed to the market price for gas.

Appendix IV NAPs II

We used information on the second phase cap from the National Allocation Plans submitted to the European Commission (2006b), and from the NAP II drafts published for public debate by those countries that had not officially approved them yet, as they represent the most up to date data available.

As the NAPs for DK and HU have not been published (as of 24.9.2006) we assumed the same ratio between their cap 2005-2007 and 2008-2012 as applicable to average of the other member states.

We included the entire New Entrant Reserve in the cap and also included the emissions that are currently envisaged for auctions (7 % UK, 0.29% Belgium, 3.9 MtCO₂ Netherlands, 2.6 MtCO₂ Poland, 0.48 MtCO₂ Lithuania, 0.11 MtCO₂ Ireland, 0.4 MtCO₂ Austria, 0.19 MtCO₂ Luxembourg).

We assume total available CDM and JI credits for the period 2008-2012 are between 800 and 2200 MtCO₂ while Japanese demand could range between 250 and 1000 MtCO₂ (Grubb and Neuhoff, 2006). Very high availability is unlikely to coincide with very low Japanese demand and vice versa. We also have to allow for demand from governments to cover excess emissions in the non-covered sector. Thus we assume that inflows into ETS in the period 2008-2012 could range between 0 and 1000 MtCO₂.

Table 1 summarises our assumptions about the cap.

Appendix VI Historical emissions and linear trend

We used data on the total per country green house gas emissions for the period 1990-2004 from the annual European Community GHG Inventory (EEA 2006).

Projections for 2005-2012 have been obtained by linear regression of the available sample of total GHG emissions for each country. The initial analysis on a country by country level pointed to the well known strong decline of emissions in accession countries during their early transformation in the 1990th, and therefore we subsequently excluded data for Czech Republic, Estonia, Hungary, Lithuania, Latvia and Slovakia for the years until 1992, 1993, 1992, 1998, 1995 and 1993 for the estimation of the linear trend.

We then used data on the ETS share of CO₂ emissions relative to the total GHG emissions from Georgopoulou et al. (2005) based on 2003 data and thus were able to derive the a linear trend for EU ETS BaU emissions projections.

By adopting this procedure the implicit assumption has been made that the proportion of greenhouse gases from “trading” and “non-trading” sectors would remain unchanged. As emissions from some of the non-trading sectors such as transports are expected in fact to

increase significantly, it is likely that our approach overstates the extrapolated CO₂ emissions of the covered sector. This indicates that our estimations of CO₂ emission reductions in the covered sector are conservative and might potentially be higher, e.g. even more stringent CAPs would be required to ensure a strong CO₂ price.

Appendix VII CITL classifications

An analysis of the CITL raw data performed by Entec highlighted the existence of ‘some fundamental errors with regards to classification in the EC database of sites by sector/activity’, although the cause is ‘not yet known’ (Entec 2006: p4). Some of the problems of miss-classification are addressed in our projections:

- a) An analysis of the CITL classification compared to that of NAP I for Spain, Italy and UK illustrates some differences, which are however not persistent across countries and sectors. For Italy the discrepancy is minimal (with the maximum around 2%), while although it is more relevant for UK and Spain, it is not in the same sectors. Therefore on aggregate they might to some extent average out.
- b) Thanks to more accurate aggregate country data for the power sector (including CHP) provided by WIFO it has been possible to correctly distinguish non-power verified emissions from the CITL “Combustion” class, thus substantially reducing the possible distortion scope to only 44% of the total cap in terms of allocations.
- c) If remaining errors are in the order of 5% and imply misspecification between sectors that have different projected CO₂ growth rates of 2% then the aggregate error (1.02^7 after 7 years, e.g. 15%) is 0.3%.

Appendix VIII Analysis: Allocated versus verified

Based on the data available in the Community Independent Transaction Log we could compare for every installation the verified emissions with the allocated allowances for the year 2005 (EU Commission 2006a). We grouped all installations where over/under allocation fall within ranges of $\pm 2.5\%$ under/over allocation. The intervals are then labelled according to the middle value of the interval. The remaining installations were summarised in the +100% and -100% categories.

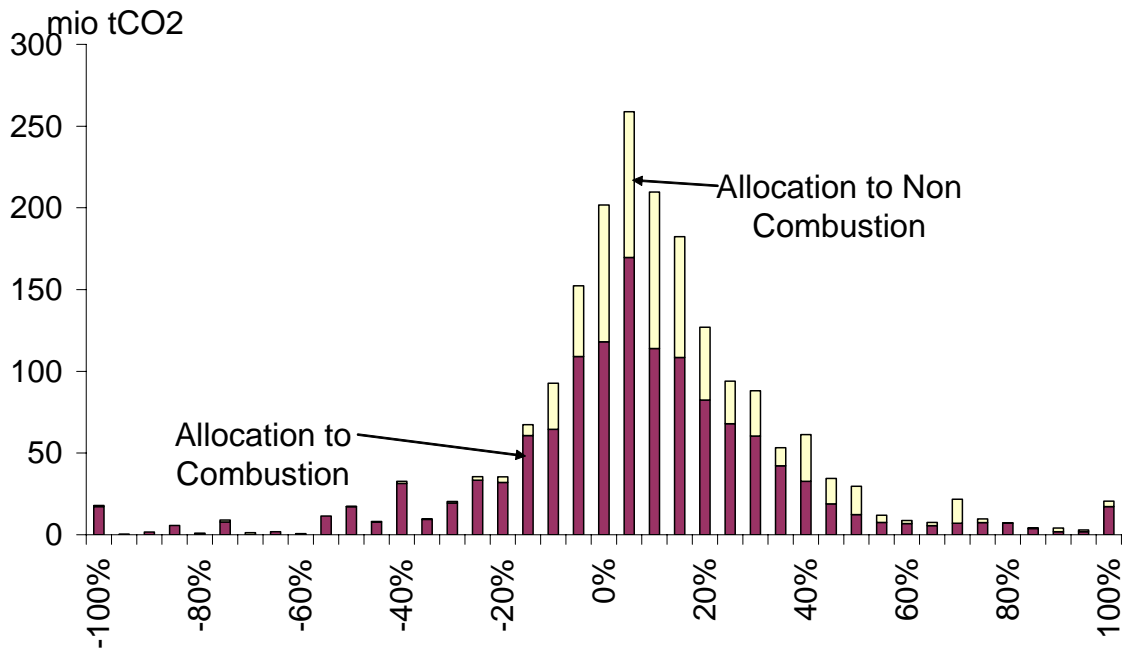


Figure 5 Relationship between verified emissions and allowances allocated to installations in 2005.

Figure 5 shows the distribution of total emission permits according to the extent of under/over allocation at installation level as a fraction of the allocation received. The distribution is bell shaped with a mean higher than zero, reflecting the overall long position of the EU ETS. According to the CITL classification, Non Combustion installations in general received more allowances compared to the needs than Combustion, although the latter includes both Power and non-power sector installations, thus distorting the analysis adding over allocated installations to the category.

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