

# What Should the US Learn from the EU ETS?

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# **Evaluation from a Different Perspective**

- **Not concerned with ETS Review, or how to improve the existing system**
  - **Depends a lot on specific EU circumstances**
  - **In fact, a multinational system**
- **Serious debate on C&T beginning in the US**
  - **Surprising amount of attention to EU ETS**
- **What does the EU ETS teach the US (or others) to do and not to do?**

# **Lesson #1: A carbon price won't “wreck” the economy**

- **An exaggerated argument, but effective**
- **The EU economy has thrived and even equaled (!) US performance since 2005**
- **Could dodgy US sub-prime mortgages have more effect than a CO<sub>2</sub> price?**
- **Good EU economic performance also not due to the carbon price; just one of many**
- **At last, a quiet and compelling example from Europe**

## **Lesson #2: Adopt a long horizon with banking and borrowing**

- **Repeated, sequential trading period is largest defect in EU ETS**
  - **Disincentive to investment or a politically helpful ambiguity?**
- **Alternative is long-horizon, pre-specified caps with review**
  - **Difference is in the presumption**
- **No evidence of abuse of borrowing in ETS**
  - **A radical innovation in emissions trading**

## **Lesson #3: A Safety Valve May be Warranted!**

- **Initial prices can exceed expectations**
  - Seen also in US OTC/NO<sub>x</sub> Budget Program
  - In both cases, due to regulatory uncertainty, inexperience, and institutional features
- **Perhaps a transitional, phase-in feature?**
  - Motivation more political than economic
  - Lack of confidence/experience in GHG abatement
- **Can long horizons and borrowing be a substitute?**

## **Lesson #4: Make sure installation-level data is available**

- **A big problem in ETS NAP1 exercise**
- **Free allocation to incumbents assumes good installation-level data**
  - **All existing systems have high initial levels of free allocation**
- **Good cap-setting also assumes good data on covered sectors**
  - **Probably bigger problem in NAP1**

## **Lesson #5: Upstream MRV for small sources**

- **EU ETS uses an upstream MRV method applied downstream**
  - It works, but high transaction cost for small sources
  - Also justifies less rigorous MRV “tier”
- **If EU ETS expands coverage, it will be forced to upstream MRV**
- **For US system with transport or res/com sectors, go upstream from start**

# Some More Problematic Lessons?

- **New entrant and closure provisions**
  - Ubiquitous in EU ETS but rare in US
  - But present in Bingaman & Lieberman bills
- **BTA provisions**
  - Presumption of “deep then broad” or simply an option (that may not be used)?
- **Auction/free allocation split and evolution**
  - High initial & phased-out free allocation observed in principle and practice in EU
  - But much higher initial level than proposed in US



# More generally...

- **It works**
- **It is not a big thing economically, and**
- **It can't be ignored in thinking about global architecture**
  - **A fact on the ground diplomatically**
  - **The “motor” of the world carbon market**
  - **Engaging China & India in a global trading regime**