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

April 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 (April 2010 through March 2011) for credits valid for Compliance Year 2010 is \$1,425 per ton. In comparison, the average price of Compliance Year 2009 RTCs was \$951 per ton for the corresponding period ending March 2010 (as reported in April 2010). For Compliance Year 2011 NOx RTCs, the twelve-month rolling average price for April 2010 through March 2011 is \$7,950. In comparison, the twelve-month rolling average of Compliance Year 2010 RTCs was \$4,542 per ton for the corresponding period ending March 2010 (as reported in April 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 April 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 March 2011, 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 March 2011. 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 continue to be updated on a monthly basis and reported to the Stationary Source Committee on a quarterly basis.

Historically, trading of a particular RTC is most active during the reconciliation period following its expiration date when facilities perform their final emission reconciliation. As shown in Figure I, this trend is repeated for Cycle 1 2010 NOx RTC during January and February 2011, the annual reconciliation period for Cycle 1 facilities. For Cycle 2 facilities, the annual reconciliation period is July and August. During these sixty-day periods, the trading volumes are normally higher, and prices also drop when compared to the other preceding months as the end of the annual reconciliation period approaches because these credits can no longer be traded beyond this period.

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 April 2010 through March 2011 is \$1,425 per ton. In comparison, the average price of Compliance Year 2009 RTCs was \$951 per ton for the corresponding period ending March 2010 (as reported in April of 2010). For Compliance Year 2011 NOx RTCs, the average price for April 2010 through March 2011 is \$7,950. In comparison, the twelve-month rolling average of Compliance Year 2010 RTCs was \$4,542 per ton for the corresponding period ending March 2010 (as reported in April 2010). RTC prices generally decline as the expiration date approaches. Therefore, the appropriate comparison of the April 2010 through March 2011 average price of Compliance Year 2010 RTCs is to the April 2009 through March 2010 average price of

Compliance Year 2009 RTCs. Similarly, the appropriate comparison of the April 2010 through March 2011 average price of Compliance Year 2011 RTCs is to the April 2009 through March 2010 average price of Compliance Year 2010 RTCs.

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 March 2011.



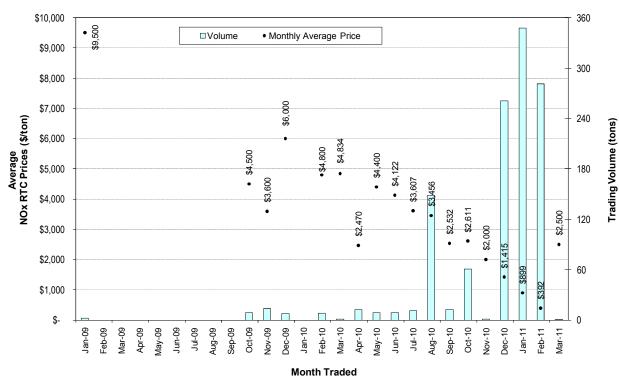


Table I

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

Twelve-Month Rolling Average Price Data for Compliance Year 2010 NOx RTC						
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-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		
Feb-11	Feb 10 - Jan 11	881.3	\$1,575,854	\$1,788		
Mar-11	Mar 10 - Feb 11	1,154.2	\$1,647,514	\$1,427		
Apr-11	Apr 10 - Mar 11	1,153.7	\$1,643,821	\$1,425		

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

Figure II

Compliance Year 2011 NOx RTC Monthly Average Price and Volume Traded (January 2010 through March 2011)

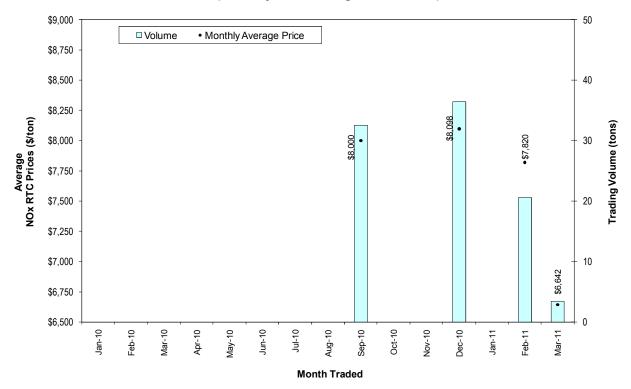


Table II

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 - March 2011)						
		Total Volume Traded with				
		Price During Past 12-month	Total Value Traded	Rolling		
Reporting Month	12-Month Period	(tons)	During Past 12-month	Average Price (\$/ton)		
Jan-11	Jan 10 - Dec 10	69.0	\$555,180	\$8,052		
Feb-11	Feb 10 - Jan 11	69.0	\$555,180	\$8,052		
Mar-11	Mar 10 - Feb 11	89.5	\$715,950	\$7,999		
Apr-11	Apr 10 - Mar 11	92.9	\$738,200	\$7,950		