



**ANNUAL REPORT ON THE MARKET
FOR RGGI CO₂ ALLOWANCES: 2024**

Prepared for:

RGGI, Inc., on behalf of the RGGI Participating States

Prepared By:



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The Regional Greenhouse Gas Initiative (RGGI) is a cooperative effort of Eastern states of the US to reduce emissions of carbon dioxide (CO₂) from the power sector.

RGGI, Inc. is a non-profit corporation created to provide technical and administrative services to the states participating in the Regional Greenhouse Gas Initiative.

¹ While technically a RGGI participating state, Pennsylvania is currently awaiting adjudication from the state's Supreme Court as to whether it will be allowed to actively participate in RGGI & RGGI Inc. related activities.

Table of Contents

I. Executive Summary	5
II. Background on the CO₂ Allowance Market.....	11
A. Regional CO ₂ Emissions Cap	11
B. Compliance Obligations.....	15
C. CO ₂ Allowance Tracking System (“COATS”).....	16
D. Primary Market for RGGI CO ₂ Allowances	16
E. Secondary Market for RGGI CO ₂ Allowances	17
III. CO₂ Allowance Prices.....	20
A. Prices in the Auctions and the Secondary Market	20
B. Volatility of CO ₂ Allowance Prices	22
IV. Trading and Acquisition of CO₂ Allowances	26
A. Distribution of Auction Awards.....	27
B. CO ₂ Allowance Trading Volumes	28
C. Acquisition of CO ₂ Allowances in the Secondary Market	29
D. Patterns of CO ₂ Allowance Holdings	31
V. Participation in the CO₂ Allowance Market	34
A. Demand for CO ₂ Allowances.....	35
B. Participation in RGGI Auctions.....	36
C. Acquisition of CO ₂ Allowances by Individual Firms	37
D. Participation in the CO ₂ Allowance Futures Market	40
VI. Discussion of Market Monitoring.....	44

Table of Figures

Figure 1: CO₂ Allowance Prices in the Auctions and Secondary Market	21
Figure 2: Option-Implied Volatility of CO₂ Allowance Futures Prices	24
Figure 3: Distribution of Auction Awards.....	27
Figure 4: Volume of Trading of CO₂ Allowances and Allowance Futures.....	29
Figure 5: Net Changes in Futures Open Interest and Net Transfers of CO₂ Allowances...	30
Figure 6: Sources of CO₂ Allowances Held in COATS Accounts	32
Figure 7: Estimated Demand for CO₂ Allowances.....	35
Figure 8: Number of Bidders According to the Quantity of Bids Submitted	37
Figure 9: Distribution of Auction Awards.....	38
Figure 10: Distribution of CO₂ Allowance Holdings	39
Figure 11: Concentration of Open Interest in Futures and Option	41
Figure 12: Concentration of Open Interest in Futures and Options by Trader Type	42
Figure 13: Number of Traders in ICE Futures and Options.....	42

I. EXECUTIVE SUMMARY

The Regional Greenhouse Gas Initiative (“RGGI”) became the first mandatory cap-and-trade regional initiative to limit CO₂ emissions in the United States in 2009. Electric power generators with generating capacity at or above 25 MW located in the states participating in RGGI have been required to obtain the number of CO₂ allowances equal to the number of short tons of CO₂ they emit.²

RGGI distributes CO₂ emissions allowances to the market primarily through auctions, making it distinctive among existing cap-and-trade programs. Ninety-four percent of the CO₂ allowances that have entered circulation initially entered the market through one of the auctions. Through the end of 2024, RGGI has conducted 66 successful auctions, selling a total of 1.44 billion CO₂ allowances for \$8.6 billion.

The RGGI CO₂ emissions cap was 96.2 million short tons for the ten states participating in 2020, and the cap will be reduced gradually each year until it reaches 67.3 million short tons in 2030. For each year from 2021 to 2025, the annual cap is further adjusted downward in each year to account for the 95.5 million allowance surplus that remained at the end of 2020.³ In 2024, the annual cap was adjusted down by nearly 14.7 million short tons.

RGGI is designed to allow additional jurisdictions to become Participating States. When a jurisdiction becomes a Participating State, the annual emissions cap and the number of emission sources rise accordingly. From 2021 to 2023, Virginia was a Participating State with a total allowance sale of 68 million and total emissions of 75 million short tons.

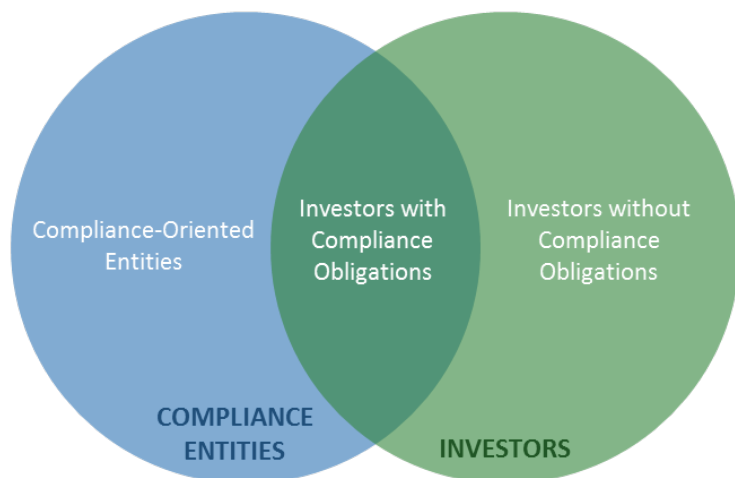
This report evaluates activity in the market for RGGI CO₂ allowances in 2024, focusing on the following areas: allowance prices, trading and acquisition of allowances in the auctions and the

² Since 2020, New York uses a limit of 15 MW for units which are physically co-located with an existing budget source and for any unit at a facility with two or more units with 15 MW or greater nameplate capacities.

³ The details of the annual emission caps are described further in Section II.A.

secondary market, participation in the market by individual firms, and market monitoring. For reporting purposes, firms are often broken up into the following categories:

- *Compliance-Oriented Entities* – Compliance entities that appear to acquire and hold allowances primarily to satisfy their own compliance obligations.
- *Investors with Compliance Obligations* – Firms that have compliance obligations, but which hold a number of allowances that exceeds their estimated compliance obligations by a margin suggesting they also buy for re-sale or some other investment purpose. These firms often transfer significant quantities of allowances to unaffiliated firms.⁴
- *Investors without Compliance Obligations* – Firms without any compliance obligations.



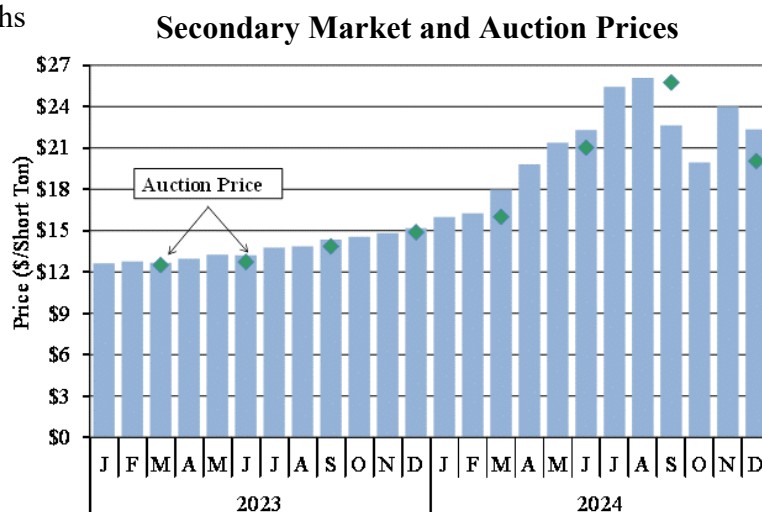
In this report, the “Investors with Compliance Obligations” category is sometimes combined with one of the other two categories when discussing market trends and participation. In all such cases, the text of this report clearly defines the grouping as either: “compliance entities” combining the first and second categories or “investors” combining the second and third categories. These categories are illustrated by the diagram above.

CO₂ Allowance Prices

Prices rose gradually throughout 2023 from an average of \$12.63 in January to \$15.18 in December. In 2024, secondary market prices rose steeply and peaked at \$26 in August 2024.

⁴ The assessment of whether a compliance entity holds a number of allowances that exceeds its compliance obligations by a margin that suggests they are also buying for re-sale or some other investment purpose is based on: (a) the entity’s forecasted share of the total compliance obligations for the entire RGGI footprint through 2026, (b) the total number of allowances in circulation, and (c) consideration of the pattern of the entity’s allowance transfers to unaffiliated firms versus affiliated firms. Since the designation of a compliance entity as an investor is based on a review of its transactions and holdings, the designation of a particular firm may change over time as more information becomes available. Therefore, some of the quantities in this report may not match previous reports because of changes in the classification of particular firms.

Prices were volatile in the final months of 2024, falling to \$20 in October, rising to \$24 in November, and then falling again to \$22 in December. Accordingly, the option-implied volatility of RGGI allowance futures increased dramatically from an average of 24 percent in 2023 to 50 to 60 percent in the second half of 2024.



The volume-weighted average auction clearing price increased 49 percent from \$13.58 in 2023 to \$20.17 in 2024, and secondary market prices generally followed the same trajectory as contemporaneous auction clearing prices throughout both years.⁵

The Cost Containment Reserve (“CCR”) influenced RGGI allowance price formation in 2023 and 2024.⁶ The CCR is designed to limit upward price movements by increasing auction sales if the clearing price is above the CCR Trigger Price level. The CCR Trigger Price rose to \$14.88 in 2023 and \$15.92 in 2024. The December 2023 auction clearing price was set at \$14.88 resulting in the sale of a portion of the CCR for 2023 and reducing the momentum of rising prices in late 2023. The CCR Trigger Price was exceeded in the March 2024 auction, fully depleting the CCR for 2024. With the exhaustion of the CCR, prices rose steeply in subsequent months. The CCR is scheduled to rise 7 percent each year from 2024 to 2030.

Acquisition and Holdings of CO₂ Allowances

Firms initially acquire CO₂ allowances in the primary market, mainly by purchasing them in the quarterly auctions. Firms can also buy and sell CO₂ allowances in the secondary market.

⁵ Allowance prices are summarized in Section III.A, and price volatility is evaluated in Section III.B.

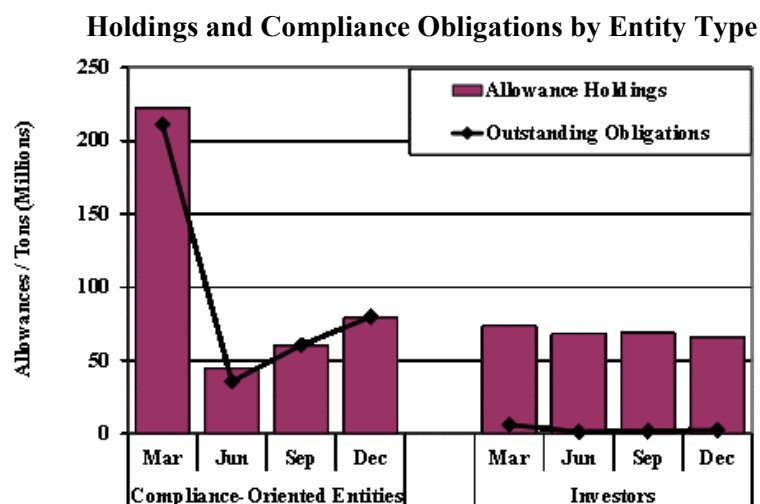
⁶ The CCR and other program details are described further in Section II.A.

Secondary market activity consists mainly of trading of futures and options contracts on the public exchange and transfers of ownership recorded in COAT (“CO₂ Allowance Tracking System”).

The private bank of surplus CO₂ allowances fell during 2024 from 70 million at the beginning of the year to 62 million at the end of the year.⁷ The surplus is generally expected to decrease over time since the Participating States have adopted “interim adjustments” in each Program Review that are designed to gradually reduce the allowance surplus.⁸ The Third Adjustment to the cap reduced the number of allowances sold by 19.1 million per year from 2021 to 2023 and by 14.7 million per year in 2024 and 2025.

The figure above summarizes the holdings of CO₂ allowances at the end of each quarter in 2024 for two categories of firms.⁹ It shows that, as a group, compliance-oriented entities held enough CO₂ allowances to fully cover their fifth control period compliance obligations in 2024 and a sufficient quantity to satisfy interim compliance in March 2025. These entities held 79 of the 145 million allowances in circulation at the end of 2024.

Although some compliance-oriented entities used the secondary market as the primary means of acquiring CO₂ allowances, compliance-oriented entities relied more on the auctions in 2024. Of



⁷ We define the “private bank of allowances” as the number of allowances in circulation (i.e., in Compliance Accounts or in General Accounts). We define the “private bank of *surplus* allowances” as the number of allowances in circulation minus the compliance obligations for which allowances have not been surrendered.

⁸ The First Control Period Interim Adjustment (“FCPIA”), the Second Control Period Interim Adjustment (“SCPIA”), and the Third Adjustment for Banked Allowances are described in Section II.A.

⁹ Monthly totals are provided with additional detail in Section IV.D.

the CO₂ allowances held by compliance-oriented entities at the end of 2024, 44 million were acquired through auctions or state allocations during 2024, 33 million were acquired from the secondary market during 2024, and 2 million were retained from the prior year. The largest allowance transfers between unaffiliated firms occurred in February, just prior to the March interim compliance deadline and in December due to the settlement of December contracts. A robust secondary market is beneficial because it provides compliance entities with more flexibility about when they can purchase CO₂ allowances.

Investors without compliance obligations purchased significant quantities of allowances in the auctions, but overall investor holdings fell by 11 million allowances at the end of 2024 compared to the beginning of the year. These investors purchased 21 million (30 percent) of the allowances auctioned in 2024. While some investors used the secondary market to acquire allowances, by the end of 2024 investors transferred over 30 million allowances on net via the secondary market to compliance entities. Investors with compliance obligations purchased about 8 million allowances in the auctions and 9 million allowances in the secondary markets contributing to a net increase in their holdings by the end of the year. Investors play an important role in the RGGI allowance market by ensuring that compliance entities have liquid options for purchasing allowances outside of the quarterly auctions. This allows compliance entities to purchase RGGI allowance futures throughout the year to financially hedge the compliance costs they incur from producing electricity.

Participation in the Market by Individual Firms

Participation by many firms promotes competition and helps ensure that CO₂ allowance prices are determined efficiently. Over time, firms that need CO₂ allowances for compliance should be able to acquire them through the auctions and/or the secondary market, and the holdings of individual firms should be relatively consistent with their potential uses for allowances.¹⁰

¹⁰ Participation in the auctions and the secondary market by individual firms is evaluated in Section V.

In 2024, we observed broad participation in the RGGI market. The demand for CO₂ allowances is dispersed relatively widely across firms as the three largest compliance-oriented entities accounted for 38 percent of the total projected demand compared to 37 percent in 2023. The average number of auction participants fell slightly to 54 from 56 in the previous year.

Allowance holdings were generally distributed across compliance-oriented entities consistent with their compliance obligations, although the surplus of allowances in circulation led many individual firms to hold substantial surpluses. The top ten compliance-oriented entities, by estimated demand for allowances, accounted for about 39 percent of total holdings, which is lower than in 2024 primarily due to the departure of Virginia from RGGI. The top ten investors (ranked by surplus holdings) held about 41 percent of allowances. These levels are consistent with competitive expectations given that the current private bank of allowances far exceeds the outstanding compliance obligations of firms in the sixth control period. With increased or steady participation by compliance-oriented entities, passive investment funds, and other financial investors with active trading operations, the number of firms with reportable positions in ICE futures and options rose in 2024, peaking at 75 firms in a single week compared to a maximum of 63 such firms in the prior year.

Market Monitoring

As the RGGI Market Monitor, we evaluate the conduct of market participants in the auctions and in the secondary market to identify potential anti-competitive conduct. We also assess whether the auctions were administered properly by Enel X.

In our reviews of the four auctions in 2024, we found no material concerns regarding the auction process, barriers to participation in the auctions, or the competitiveness of the results. Large numbers of firms participated in the offerings of CO₂ allowances. Further, we found that the auctions were administered in accordance with the noticed rules and bids received.

We find no evidence of anti-competitive conduct in the secondary market for CO₂ allowances, and we find that firms have generally purchased quantities of allowances that are consistent with their expected needs.

II. BACKGROUND ON THE CO₂ ALLOWANCE MARKET

In 2009, RGGI became the first mandatory market-based regional initiative to limit CO₂ emissions in the United States. Market-based cap-and-trade programs work by setting an aggregate emissions limit for a particular class of emitters and requiring them to acquire a number of allowances sufficient to cover their emissions. Firms that own allowances can decide whether it is more profitable to use them to cover their emissions or to sell them to an emitter that can use them more efficiently. In this manner, the goal of market-based programs is to use market forces to reduce overall emissions in the most cost-effective ways.

In the ten states participating in RGGI in 2024, electricity generating plants with 25 MW¹¹ of capacity or greater (“CO₂ budget sources”) must acquire a number of CO₂ allowances sufficient to cover their CO₂ emissions by the end of each control period. Firms that own budget sources (“compliance entities”) can acquire CO₂ allowances through a variety of means, including by purchasing them in the quarterly RGGI auctions or in the secondary market for allowances.

The market for RGGI CO₂ allowances has several key elements, which are discussed in this section: the regional cap, compliance obligations, the CO₂ Allowance Tracking System (“COATS”), the primary market for allowances, and the secondary market for allowances.

A. Regional CO₂ Emissions Cap

The RGGI CO₂ cap for the period from 2021 to 2030 was initially determined at the end of the 2016 Program Review for the nine states participating at the time.¹² The CO₂ cap for the nine states was scheduled to fall by 30 percent from approximately 78.2 million short tons for 2020 to 54.7 million short tons for 2030. The RGGI Model Rule is designed to allow additional states to join RGGI, so the annual cap is adjusted when new states begin to participate. Since New Jersey

¹¹ As of December 2020, the New York DEC adopted revisions to Part 242 which has lowered this limit to 15 MW for units which are physically co-located with an existing budget source, and to any 15 MW unit that resides at a facility with two or more units with 15 MW or greater nameplate capacities.

¹² For a list of changes made to the Model Rule following the 2016 Program Review, see www.rggi.org/sites/default/files/Uploads/Program-Review/12-19-2017/Summary_Model_Rule_Updates.pdf.

became the tenth Participating State in January 2020, the cap was raised to 96.2 million short tons in 2020 and scheduled to fall gradually to 67.3 million short tons in 2030. With the addition of Virginia in January 2021, the cap was raised to 119.8 million short tons in 2021 and scheduled to fall gradually to 86.9 million short tons in 2030. However, Virginia stopped participating at the end of 2023, and RGGI returned to the ten-state cap, which will fall to 67.3 million short tons in 2030. The 2016 Program Review also set forth cap adjustments to account for allowances banked before 2021 and the implementation of an Emissions Containment Reserve, which are both described below in more detail.

Interim Adjustments to Account for Banked Allowances

Three adjustments have been made to the cap to account for the surpluses of allowances that were banked from allocation years 2009 to 2013 and again from allocation years 2014 to 2020.¹³ The first two interim adjustments were set forth in the 2012 Program Review, while the third interim adjustment was set forth in the 2016 Program Review.¹⁴ These are described below.

First Control Period Interim Adjustment for Banked Allowances (“FCPIABA”) – This was a reduction in the number of CO₂ allowances to be sold over the seven-year period from 2014 to 2020. The amount of the reduction was equal to the private bank of first control period CO₂ allowances (i.e., allocation years 2009, 2010, and 2011) that were in circulation after compliance was completed for the first control period. The FCPIABA was approximately 8.2 million CO₂ allowances per year from 2014 to 2020.

Second Control Period Interim Adjustment for Banked Allowances (“SCPIABA”) – This was a reduction in the number of CO₂ allowances to be sold over the six-year period from 2015 to 2020. The amount of the reduction was equal to the private bank of 2012 and 2013 allocation

¹³ Also, the emissions cap was reduced from 188 million short tons to 165 million short tons in 2012 to account for the departure of New Jersey at the end of the first control period, which ran from 2009 to 2011.

¹⁴ See www.rggi.org/program-overview-and-design/elements.

year allowances that were in excess of 2012 and 2013 emissions. The SCPIABA was approximately 13.7 million CO₂ allowances per year from 2015 to 2020.

Due to the two interim control period adjustments for banked allowances that resulted from the 2012 Program Review, the adjusted CO₂ cap fell from approximately 82.8 million in 2014 to 62.5 million in 2017 and was planned to eventually fall to 56.3 million in 2020. However, with the addition of New Jersey as a participating state in 2020, the adjusted cap for 2020 was raised to 74.3 million short tons. Including New Jersey, the number of CO₂ allowances that were distributed for the period from 2014 to 2020 was approximately 467 million. Including the 140 million surplus allowances that were already in circulation at the end of 2013, the total supply was 607 million allowances from 2014 to 2020 (not including allowances sold from the Cost Containment Reserve, which is discussed in the next part of this section.).

Third Adjustment for Banked Allowances – This is a reduction in the number of CO₂ allowances that is to be sold over the five-year period from 2021 to 2025. The reduction was initially scheduled to be approximately 19.1 million allowances per year. The amount of the reduction was based on the private bank of allowances (approximately 95.5 million allowances) that existed after the compliance deadline for the fourth control period, which ran from 2018 to 2020.¹⁵ However, since Virginia is not a Participating State after 2023, the size of the annual cap adjustment was proportionally reduced to 14.7 million per year in 2024 and 2025.

Cost Containment Reserve

RGGI implemented a provision known as the Cost Containment Reserve (“CCR”) in 2014.¹⁶ The CCR allows for the sale of a fixed number of allowances in addition to the cap when the clearing price in the quarterly auction exceeds the CCR Trigger Price. The CCR is replenished at the start of each calendar year. In 2014, the CCR had a withdrawal limit of five million allowances, and the CCR Trigger Price was \$4.00. In 2015, 2016, 2017, 2018, and 2019, the

¹⁵ See https://www.rggi.org/sites/default/files/Uploads/Press-Releases/TABA_Announcement_2021-03-15.pdf.

¹⁶ See https://www.rggi.org/sites/default/files/Uploads/Design-Archive/Model-Rule/2012-Program-Review-Update/Summary_of_Model_Rule_Changes_02_07_13.pdf.

CCR had a withdrawal limit of ten million allowances, and the CCR Trigger Prices were \$6.00, \$8.00, \$10.00, \$10.25, and \$10.51, respectively. In 2020, the annual withdrawal limit was 11.8 million allowances and the CCR Trigger Price was \$10.77.

All 15 million allowances were sold from the CCR for the period from 2014 to 2015, but the CCR was not triggered in 2016, 2017, 2018, 2019, 2020. Ultimately, the sale of these allowances from the CCR increased the surplus of allowances that was included in the Third Adjustment for Banked Allowances.

From 2021 to 2030, the size of the CCR is 10 percent of the cap in each year. The CCR Trigger Price is planned to rise from \$13.00 in 2021 by 7 percent each year, so it will reach \$23.89 in 2030. In 2021, one auction cleared at the CCR Trigger Price of \$13.00 and 3.9 million allowances were sold from the CCR. In 2023, one auction cleared at the CCR Trigger Price of \$14.88 and 5.6 million allowances were sold from the CCR. In 2024, when the Trigger Price of \$15.92 was exceeded, the CCR allowances available for the full year were depleted in the first auction in March increasing the auction sale by 8.4 million allowances over the original auction volume.

Emissions Containment Reserve

RGGI implemented a provision known as the Emissions Containment Reserve (“ECR”) in the first auction of 2021. The ECR is intended to reduce the supply of allowances in the market if emissions reduction costs are lower than expected by allowing for states to withhold allowances from circulation if the auction clearing price falls below the ECR Trigger Price. Allowances withheld under this program will not enter circulation. Up to 10 percent of a participating state’s allowance budget can be withheld using the ECR. The ECR Trigger Price was set at \$6.00 in 2021, and it is scheduled to rise by 7 percent each year. Currently, Maine and New Hampshire do not plan to utilize the ECR mechanism. Since the introduction of the ECR provision, the auction clearing prices have always exceeded the ECR Trigger Price and, thus, the ECR has never been invoked.

B. Compliance Obligations

CO₂ budget sources are fossil fuel-fired electricity generating plants with at least 25 MW of capacity.¹⁷ Shortly after the end of each control period, compliance entities must hold sufficient CO₂ allowances to cover their CO₂ emissions during the control period. The first four control periods were each three years-long, running through the ends of 2011, 2014, 2017, and 2020. The fifth control period ran from January 1, 2021 to December 31, 2023.

In March 2024, RGGI and the Participating States began conducting the final compliance process for the fifth control period, which ended December 2023. By January 30, 2024, compliance entities were required to submit all CO₂ emissions data for CO₂ budget sources for the fifth control period to the Environmental Protection Agency's ("EPA's") CAMD Business System. By March 1, 2024, the Compliance Account for each CO₂ budget source was required to hold first, second, third, fourth, and fifth control period CO₂ allowances sufficient to satisfy its compliance obligation. Each CO₂ budget source is also required to submit a Compliance Certification Report certifying that it was in compliance with its state's CO₂ Budget Trading Program.¹⁸

RGGI also has interim compliance requirements whereby compliance entities are required to surrender CO₂ allowances for 50 percent of their compliance obligations after the first and second years of each three-year control period. Thus, since 2021 was the first year of the fifth control period and covered CO₂ emissions totaled approximately 108 million short tons in 2021, compliance entities were obliged to surrender nearly 54 million allowances before the March 2022 deadline for 2021 interim compliance. For 2022, the second year of the fifth control

¹⁷ Apart from New York; see footnote 11.

¹⁸ The Compliance Summary for the first, second, third, and fourth control periods may be found at <https://rggi-coats.org/eats/rggi/>.

period, compliance entities were obliged to surrender an additional 55 million allowances before the March 2023 deadline for 2022 interim compliance.¹⁹

C. CO₂ Allowance Tracking System (“COATS”)

COATS is the registry for RGGI CO₂ allowances. Each CO₂ allowance has a unique serial number and can be used to satisfy one short ton of compliance obligation. When firms trade CO₂ allowances in the secondary market, the seller must record the transfer of ownership in COATS before the buyer is recognized as the owner.²⁰

D. Primary Market for RGGI CO₂ Allowances

The participating states have taken the approach of using auctions rather than free allocations as the primary means for distributing RGGI CO₂ allowances to the market. Accordingly, the primary market for CO₂ allowances consists mainly of the quarterly auctions.

Auctions – Through the end of 2024, 94 percent of the CO₂ allowances that have been put into circulation initially entered the market through one of the 66 auctions that had taken place on a quarterly basis since September 2008.

Offset Projects – Additional CO₂ allowances can also be awarded for approved CO₂ emissions offset projects (project-based greenhouse gas emissions reductions or carbon sequestration that occurs outside the capped electricity generation sector), although fewer than 0.1 million such allowances have been awarded thus far.

Early Reduction Allowances – In 2009, there was a one-time award by certain participating states of 2.4 million early reduction allowances (ERAs), which were awarded for qualifying CO₂

¹⁹ The compliance obligations and emissions discussed in this report do not exclude Maryland Limited Industrial Exemption Set-aside Account (LIESA) source(s). Therefore, the estimated number of allowances that must be surrendered to meet the interim compliance deadline, as reported here, will be higher than the actual interim obligation. In 2022, LIESA sources reduced the overall annual compliance obligation by about 1 million short tons.

²⁰ Public information related to the COATS registry may be found at <https://rggi-coats.org/eats/rggi/>.

emissions reductions achieved at CO₂ budget sources during 2006 through 2008, prior to the start of the first control period.

Allocations & Sales by States – Approximately 29.7 million CO₂ allowances for the first control period were allocated by individual states through either fixed-price sales or free allocations. Approximately 16.0 million CO₂ allowances for the second control period were allocated by individual states. Approximately 11.7 million CO₂ allowances were allocated for the third control period, 13.5 million were allocated for the fourth control period, and 14.0 million were allocated for the fifth control period. Thus far, 1.4 million CO₂ allowances have been allocated in the sixth control period.

Regardless of how CO₂ allowances initially enter the market, they can be traded to other firms in the secondary market.

E. Secondary Market for RGGI CO₂ Allowances

The secondary market is important for several reasons. First, it gives a firm the ability to obtain CO₂ allowances at any time during the three months between the RGGI auctions. Second, it provides a way for a firm to protect itself against the potential volatility of future auction clearing prices. Third, it provides price signals that can assist a firm in making investment decisions in markets affected by the cost of RGGI compliance.

The secondary market for RGGI CO₂ allowances comprises the trading of physical allowances and financial derivatives, such as futures, forwards, and option contracts. A physical CO₂ allowance trade occurs when the parties to the transaction register the transfer of ownership in COATS. Financial derivatives include any contracts whereby parties agree to exchange funds and/or allowances at some future date, depending in many cases on factors such as the price of allowances at some future date. Many financial derivatives eventually result in the transfer of physical CO₂ allowances (i.e., the transfer is registered in COATS), but this may occur months or years after the parties enter into a financial transaction. These include the following types of transactions:

- *Futures* – Under these contracts, two parties agree to exchange a fixed number of CO₂ allowances of a certain vintage year at a particular price at a specific point in the future

(called the “delivery month”). At the end of the delivery month, the contracted number of CO₂ allowances must be physically transferred to the buyer’s account in the COATS registry and funds must be transferred to the seller. The vintage year refers to the allocation year of the CO₂ allowance that is to be transferred. One standard futures contract equals 1,000 RGGI CO₂ allowances. These contracts are listed by an exchange with simple standardized terms to promote liquidity.

- Forwards – These are like futures contracts, but a forward contract typically requires that all financial settlement occur at expiration. These contracts can be made off an exchange between two parties, allowing the parties to agree to less standardized terms.
- Call Options – Call options give the purchaser the option to buy a fixed number of CO₂ allowances of a certain vintage year at a particular strike price at the expiration date. For example, suppose a firm holds a call option with a \$4 strike price and a December 2020 expiration date. If the price of the corresponding forward contract rose to \$5 at expiration, the firm would exercise the option to buy CO₂ allowances at \$4 and immediately sell them at \$5. Alternatively, if the price of the forward contract was below \$4, the firm would let the option expire without exercising it. One standard options contract can be exercised for 1,000 RGGI allowances.
- Put Options – Put options are similar to call options but they give the purchaser the option to *sell* a certain number of CO₂ allowances of a particular vintage year at a specified strike price at the expiration date.

Futures, forwards, and options contracts allow firms to manage risks associated with unforeseen swings in commodity prices. Futures and forwards allow firms to lock-in the prices of future purchases or sales. Options allow firms to limit their exposure to price volatility. Call options protect the purchaser if the price of the commodity increases, while put options protect the purchaser if the price of the commodity decreases. Although options provide less certainty than futures and forward contracts, they generally require less financial security since they do not obligate the holder to exercise the contract if its value declines, which could make them more attractive to some firms.

The terms of futures, forward, and option contracts vary in the degree to which they are standardized. “Exchange-traded” contracts typically have the most standardized provisions, while the term “over-the-counter” (“OTC”) is applied to contracts with less standardized provisions. However, OTC contracts, once entered into, are often settled through a clearinghouse in order to protect the parties from the risk that the counterparty defaults.

The amount of *open interest* is the net amount of futures, forwards, or options contracts that have been traded for a contract with a particular set of specifications (i.e., vintage year, delivery month, etc.), but have not reached the time of delivery, expired, or been exercised. For example, if Firm A sells 100 contracts of a particular type to Firm B, Firm A will have a short position of 100 contracts, Firm B will have a long position of 100 contracts, and the total open interest for the particular type of contract will be 100 contracts. Hence, the total open interest can be determined by summing across all of the long positions of market participants or by summing across all of the short positions.

III. CO₂ ALLOWANCE PRICES

The market for RGGI CO₂ allowances consists primarily of purchases in the quarterly auctions and trading of allowances and allowance futures and options contracts in the secondary market. The clearing prices from quarterly auctions provide public information about the market value of CO₂ allowances four times per year, while the prices of futures and forwards trades on public exchanges and transaction prices recorded in COATS provide price information more frequently. This section of the report evaluates prices in the markets for RGGI CO₂ allowances in 2024.

Key observations regarding RGGI CO₂ allowance prices:

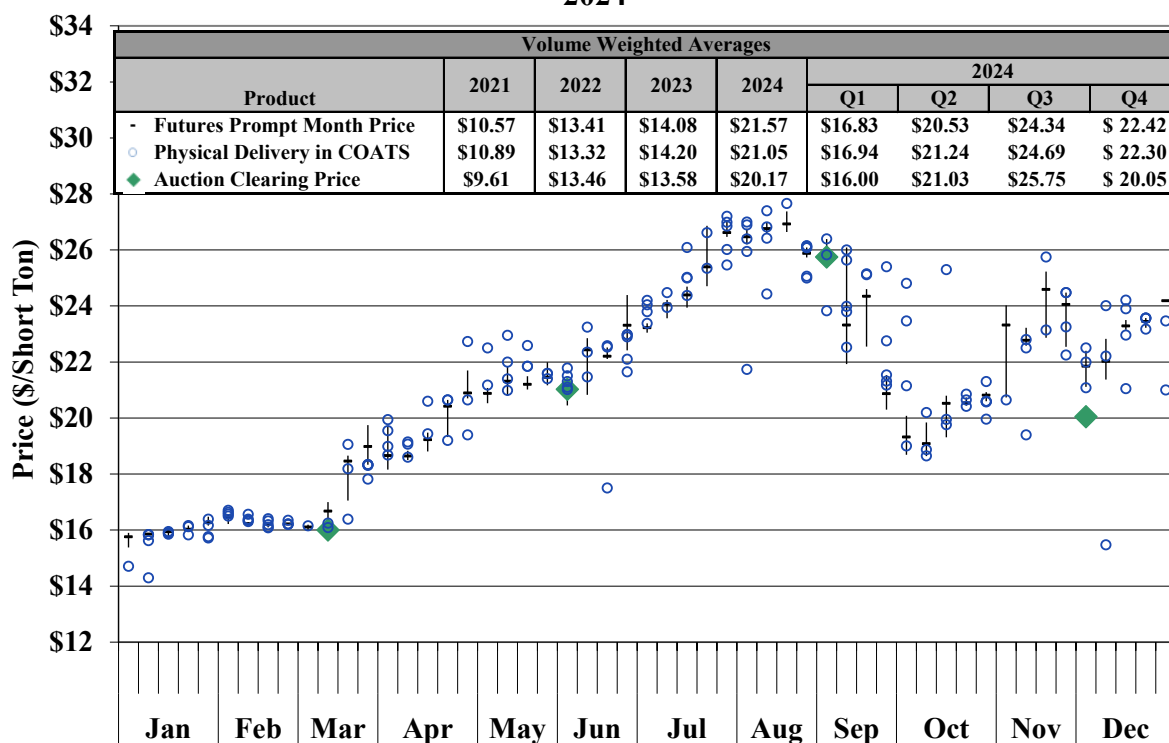
- Price Trends – At the start of 2024, secondary market prices were near \$16. Prices rose steadily in the first half of the year with some trades exceeding \$27.50 in August. Prices fell after peaking in August but still exhibited volatility. Most prices fell between \$19 and \$21 in October but then prices rose again in November. In November, prices ranged between \$21 and \$26. In December, the highest daily prices were about \$24.
- Physical Deliveries in COATS – Although the majority of physical transactions were priced similar to futures contracts, a few of these transactions differed significantly from prevailing market trends.
- Auction Clearing Prices – The volume-weighted average auction clearing price increased 49 percent from \$13.58 in 2023 to \$20.17 in 2024. The auction clearing prices were generally consistent with prices in the secondary market at the time of the auction.
- Secondary Market Price Volatility – Option-implied volatility of RGGI allowance prices was near 25 percent during 2023 and in the first quarter of 2024. After the first quarter, volatility increased to 43 percent, 54 percent, and 57 percent in the three subsequent quarters. The CCR helped to dampen price volatility in 2023 by limiting the potential for auction clearing prices to be set above the CCR Trigger Price of \$14.88. However, in 2024, the CCR was depleted in the March auction, thereby eliminating the possibility of incremental supply in the next three auctions.

A. Prices in the Auctions and the Secondary Market

Figure 1 summarizes prices in the auctions and the secondary market on a weekly basis in 2024. Intercontinental Exchange (“ICE”) and Nodal Exchange (“NEX”) futures contract prompt-month prices are summarized for each week by a black vertical line from the minimum transaction price to the maximum transaction price in the week and by a black horizontal tick mark at the volume-weighted average price for each week. The volume-weighted average price of physical deliveries of CO₂ allowances recorded in COATS are shown by blue circles for each day when a

transaction took place at a price that was recorded by the transacting parties.²¹ The figure also shows the auction clearing prices of CO₂ allowances in the four quarterly auctions held during 2024, which are represented by the green diamonds.

**Figure 1: CO₂ Allowance Prices in the Auctions and Secondary Market
2024**



Observations regarding prices in auctions and the secondary market:

- General Price Levels – At the start of 2024, secondary market prices were near \$16. Prices rose steadily in the first half of the year with some prices exceeding \$27.50 in August. Prices fell in the latter part of the year from the August peak but exhibited some volatility. Most prices fell between \$19 and \$21 in October but then prices rose again in November. In November, most prices were above \$21 but below \$26. In December, the highest daily prices were about \$24.
- Physical Deliveries in COATS – The volume-weighted average transaction price of CO₂ allowances increased 48 percent from \$14.20 in 2023 to \$21.05 in 2024. The pricing of transactions was generally consistent with futures trades and auction clearing prices

²¹ Parties must report the transaction price if there is an underlying financial transaction related to the transfer.

occurring at the same time. However, a minority of transactions were reported at other levels. These may be transactions whose price terms were determined at an earlier date.

- Auction Clearing Prices – The volume-weighted average auction clearing price increased 49 percent from \$13.58 in 2023 to \$20.17 in 2024. Auction clearing prices were the lowest at \$17 in March when the CCR was partially released and highest in September. The December auction price moderated to \$20.
- Comparison of Auction Prices and Secondary Market Prices – The auction prices were generally consistent with secondary market prices for transactions around the time of the auctions.

B. Volatility of CO₂ Allowance Prices

Cap-and-trade markets are designed to give firms efficient incentives to reduce or offset emissions. In the short-term, high-emitting generators operate less frequently in favor of low-emitting generators. In the long-term, the market will affect the decisions of firms to develop offset projects, to retire old inefficient generation, to retain existing zero-emissions generation, and to perform maintenance that increases fuel efficiency and lowers carbon-intensity.

Predictable CO₂ allowance prices decrease the risks associated with making long-term investments in reducing CO₂ emissions. Since CO₂ allowance prices can be volatile, the availability of futures and options contracts allows firms to protect themselves from the risks of such investments. This subsection evaluates two measures of price volatility in the market for RGGI CO₂ allowances.

One measure of volatility is known as *historic volatility*,²² which is a measure of volatility based on day-to-day price variations over a recent period (e.g., several months or one year). This is a useful measure when factors influencing the volatility of prices in the recent period are likely to be the same as the factors influencing the volatility of prices in the future.

Observations regarding historic volatility of CO₂ allowance prices:

²² Historic volatility is a measure of the standard deviation of the day-over-day percentage change in price. Volatility is normally expressed as an estimated standard deviation for a one-year period, even if it is calculated from a shorter period of time. In this report, volatility is calculated based on quarters and annualized for each quarter. Annual volatility discussed here is the average of the annualized quarterly-based volatility.

- *Historic Volatility in 2023 & 2024* –In the first quarter of 2023, the price volatility rose to 15 percent and then declined in the second, third, and fourth quarters to 10, 8, and 5 percent, respectively. In the first quarter of 2024, the price volatility rose to 25 percent and then 27 percent in the second quarter. It declined to 22 percent in the third quarter before steeply rising to 38 percent in the fourth quarter. The annual 2024 average price volatility was 29 percent compared to 9 percent in 2023.

Another measure of the volatility of CO₂ allowance prices is known as *option-implied volatility*,²³ which measures the volatility that is implied by the trading of option contracts for CO₂ allowances. If a firm perceives that CO₂ allowance prices are volatile, the firm may be willing to pay a high price for an option contract that protects it from unforeseen allowance price fluctuations. Likewise, if a firm perceives that CO₂ allowance prices are relatively stable, the firm will be willing to pay relatively little for the same option contract.²⁴

The following scatter plot reports the option-implied (i.e., expected) volatility of RGGI CO₂ allowance futures contracts, which can be inferred from the trading of options contracts in 2023 and 2024.²⁵ The vertical axis shows the option-implied (expected) volatility of CO₂ allowance futures prices, and the horizontal axis shows the trade date.²⁶ The figure excludes contracts if the trade date is fewer than 90 days from the contract expiration date. This is to focus on contracts that provide insight about the expected volatility of allowance prices over the long term rather than price variations around the quarterly auctions.

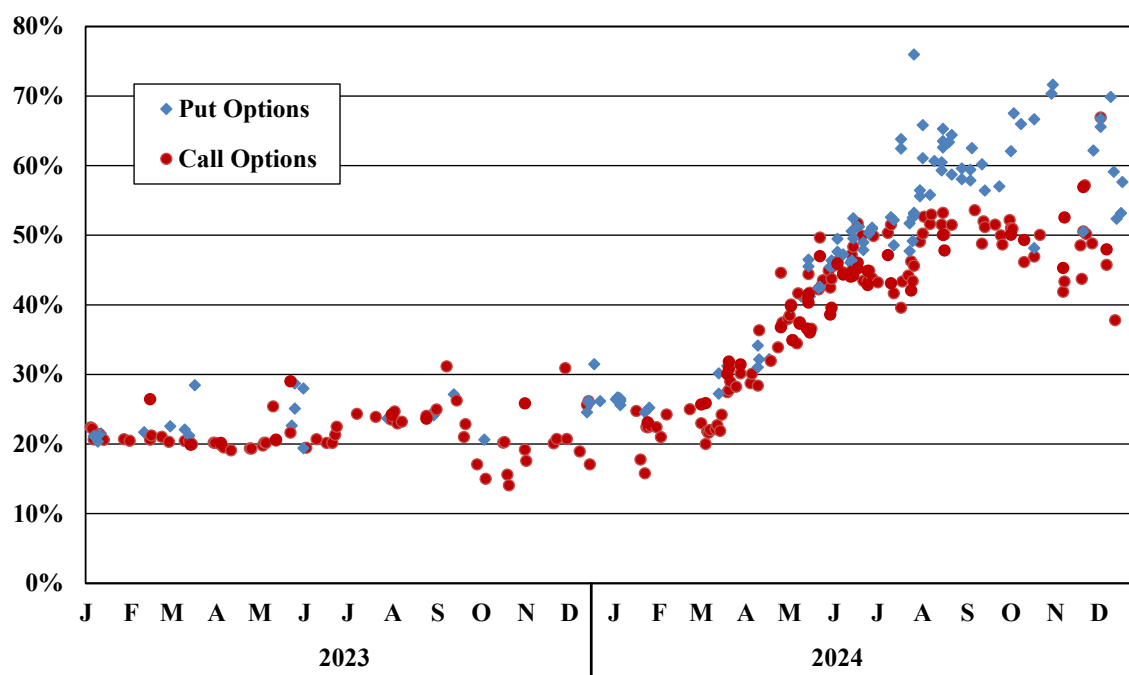
²³ The option-implied volatility of a CO₂ allowance refers to the expected standard deviation of the distribution of allowance prices one year in the future. For example, if the expected value of the price one year in the future is \$1 and the option-implied volatility is 25 percent, this implies that the probability that the price will be within 25 percent of \$1 (i.e., between \$0.75 and \$1.25) is 68.2 percent assuming that the price is distributed log-normally.

²⁴ The price of an option contract depends primarily on two factors: (i) the expected value of a CO₂ allowance relative to the strike price of the option, and (ii) the expected volatility of an allowance over the period until the expiration date. When call option prices and put option prices move in opposite directions, it signals a change in the expected price of allowances. Conversely, when call option prices and put option prices move in the same direction, it signals a change in the expected volatility of allowance prices.

²⁵ Black's model for valuing futures options is used to estimate the option-implied volatilities of RGGI allowance futures prices.

²⁶ In reports prior to 2024, Figure 2 excluded contracts if the trade date is fewer than 90 days from the contract expiration date. These short-term contracts are no longer excluded in the figure.

**Figure 2: Option-Implied Volatility of CO₂ Allowance Futures Prices
2023 & 2024**



Observations regarding the option-implied volatility of CO₂ allowance prices:

- General Patterns of Volatility* – For the first six months of 2023, option implied volatility remained at about 22 percent on average. After July through the end of 2023, option implied volatility was higher but stable averaging around 25 percent. In the first quarter of 2024, option implied volatility remained between 25 and 30 percent. After March, volatility rose steeply climbing to 50 percent for call options and reaching as high as 70 percent for put options. By the end of the quarter, call options' volatility remained mostly between 50 percent, and put options' volatility fell below 60 percent.
- Cost Containment Reserve and Emissions Containment Reserve* – The CCR and the ECR provisions were introduced into RGGI in February 2013 and December 2017, respectively. Since 2013, the CCR has been a significant factor in reducing the volatility of allowance prices. The CCR reduces volatility directly by making additional supply available if allowance prices rise to the prescribed levels. The ECR, first implemented in 2021, reduces volatility directly by reducing supply if allowance prices fall to the prescribed levels. Both the CCR and the ECR also have significant indirect effects on expectations, reducing the likelihood of price variations far outside the ECR and CCR values (adjusted for expectations of inflation and the time-value of money). For example, the placement of the ECR trigger price at \$6.87 and the CCR trigger price at \$14.88 in 2023 reduced the likelihood that prices would fall outside of this range in 2023. In Auction 62, the CCR set the clearing price at \$14.88. The CCR trigger price of \$15.92 in Auction 63 was met in March 2024, resulting in the depletion of the entire 2024 CCR

supply. Following this, option-implied volatility increased steadily and only moderated at the end of the year.

IV. TRADING AND ACQUISITION OF CO₂ ALLOWANCES

This section evaluates the trading and acquisition of CO₂ allowances in the primary and secondary allowance markets. Firms initially acquire CO₂ allowances in the primary market, mainly by purchasing them in the quarterly auctions. Firms then buy and sell CO₂ allowances in the secondary market. Secondary market activity can be observed from information about the trading of futures and options contracts on public exchanges and in the OTC market as well as from the transfers of ownership recorded in COATS. This section analyzes the movement of CO₂ allowances from their initial introduction to the market and in the secondary market.

Key observations regarding trading and acquisition of CO₂ allowances:

- *CO₂ Allowances in Circulation* – The number of allowances in circulation decreased from 278 million at the end of 2023²⁷ to 145 million at the end of 2024 as the amount surrendered for the fifth control period compliance exceeded the amount purchased in the auctions. In 2024, 207 million allowances were surrendered for the fifth control period. The private bank of surplus allowances fell from 70 million at the end of 2023 to 62 million at the end of 2024 but was higher due to the release of 8 million CCR allowances.
- *Participation by Compliance-Oriented Entities* – Of the allowances circulating at the end of 2024, 79 million (55 percent) were held by compliance-oriented entities, 1 million fewer than their outstanding compliance obligations (80 million) at the time and about 40 million more than their interim compliance obligation due in March 2025.
- *Participation by Investors* – Sixty-five million CO₂ allowances (45 percent) were held by investors at the end of 2024. Large allowance holdings by investors are expected given the large current surplus of allowances. As the CO₂ emissions cap tightens in the coming years, the proportion of allowances held by investors is likely to fall.
- *Trading Activity in the Secondary Market* – The volume of futures trading increased 64 percent from 442 million CO₂ allowances in 2023 to 727 million in 2024. The volume of allowance transfers between unaffiliated firms in COATS increased 41 percent from approximately 110 million CO₂ allowances in 2023 to 155 million in 2024. Overall, the secondary market was relatively liquid and competitive in 2024.
- *Patterns of CO₂ Allowance Acquisition* – Of the CO₂ allowances in circulation at the end of 2024, 20 percent were held by firms since the beginning of the year, 51 percent were

²⁷ The 2023 Annual Report indicated 282 million allowances were in circulation at the end of the year. The value reported here is lower because it: excludes allocations made in 2024 prior to the March 1 compliance deadline, reflects final compliance deductions for exempted biomass and cogeneration emissions, and corrects an error in the previous report.

held by firms that acquired them through auctions or state allocations in 2024, and 29 percent were held by firms that purchased them in the secondary market in 2024.

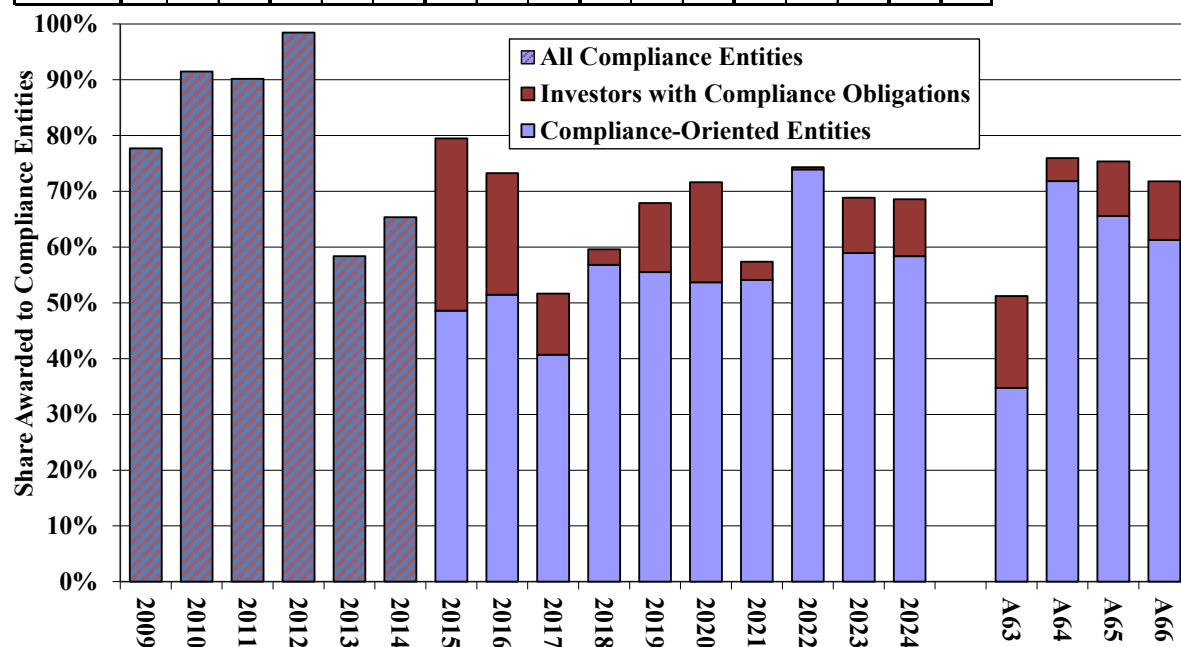
- *Reliance on the Auctions versus the Secondary Market* – Of the CO₂ allowances held by compliance-oriented entities at the end of 2024, 44 million were held by firms that directly acquired them through auctions or state allocations during 2024, while 33 million were held by firms that purchased them in the secondary market during 2024. Compliance-oriented entities acquired 51 percent of their holdings from auctions (excluding allocations) in 2024.

A. Distribution of Auction Awards

Figure 3 reports the quantity of CO₂ allowances offered and sold in each 2024 auction (i.e., Auctions 63 through 66) and in each year from 2009 to 2024. The height of each bar represents the percentage of CO₂ allowances (as a share of allowances sold) purchased by compliance entities, while the remaining share was purchased by investors without compliance obligations.

Figure 3: Distribution of Auction Awards

Control Period	CP1			CP2			CP3			CP4			CP5			CP6	Total
Year	'09	'10	'11	'12	'13	'14	'15	'16	'17	'18	'19	'20	'21	'22	'23	'24	
Initial Sales	128	147	92	87	153	73	62	60	58	54	52	65	92	89	88	64	1363
Unsold	1	31	85	60	-	-	-	-	-	-	-	-	-	-	-	-	176
CCR Sales						5	10	-	-	-	-	-	4	-	6	8	33



Before 2015, all compliance entities are shown together in Figure 3. Beginning in 2015, compliance entities are divided into two categories: blue bars showing the percentage of allowances purchased by compliance-oriented entities, and red bars showing the percentage of

allowances purchased by investors with compliance obligations. The table shows the numbers of allowances sold in the initial offering and from the CCR and unsold allowances in each year.

Observations regarding the distribution of auction awards in Figure 3:

- *Compliance Entities* – The share of CO₂ allowances purchased in the auctions by compliance entities (excluding investors with compliance obligations) decreased from 59 percent in 2023 to 56 percent in 2024.
- *Investors* – The share of allowances purchased in the auctions by investors with compliance obligations fell to 8 percent in 2024 from 9 percent in 2023. The share of allowances purchased by investors without compliance obligations averaged 33 percent compared to 36 percent in 2023. The total number of allowances purchased by investors fell to 24 million from 29 million in 2023.

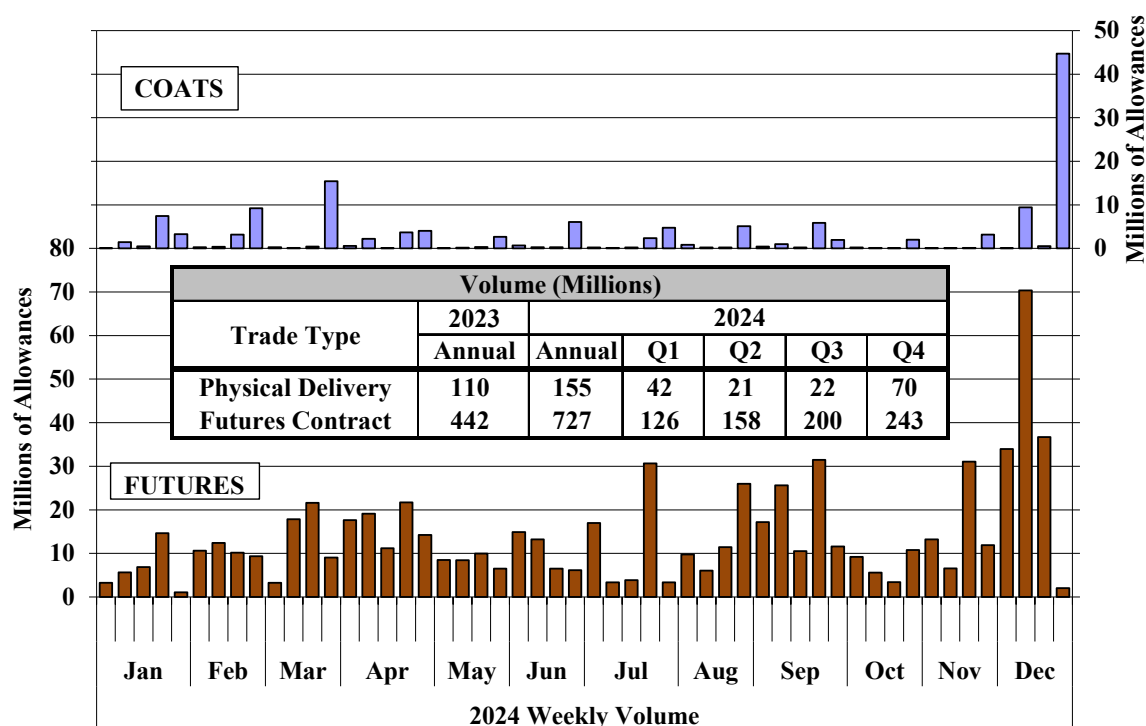
B. CO₂ Allowance Trading Volumes

The following figure summarizes the volume of trading of futures and forward contracts on the Intercontinental Exchange (“ICE”) and Nodal Exchange (“NEX”) and CO₂ allowances transfers between unaffiliated parties that were recorded in COATS in 2024. The bottom portion of the figure is plotted against the left vertical axis and shows the weekly volume of futures trading of CO₂ allowance contracts. The top portion of the figure is plotted against the right vertical axis and shows the weekly volume of CO₂ allowance transfers between unaffiliated firms that are reported in COATS. The table shows quarterly volumes in 2024 as well as a year-over-year comparison of the total volume of futures trading and CO₂ allowance transfers in COATS.

Observations regarding CO₂ allowance trading volumes:

- *Volume of Futures Trading* – The volume of futures trading totaled approximately 727 million CO₂ allowances in 2024, up 64 percent from 2023. About one-third of the 2024 volume occurred in the fourth quarter, when 243 million was traded.
- *CO₂ Allowance Transfers* – The volume of allowance transfers between unaffiliated firms was 155 million in 2024, up from 110 million in 2023. Allowance transfers were the highest in December as a result of the settlement of the benchmark futures contract. Forty-five percent of 2024 allowance transfer volume occurred in the fourth quarter.

Figure 4: Volume of Trading of CO₂ Allowances and Allowance Futures

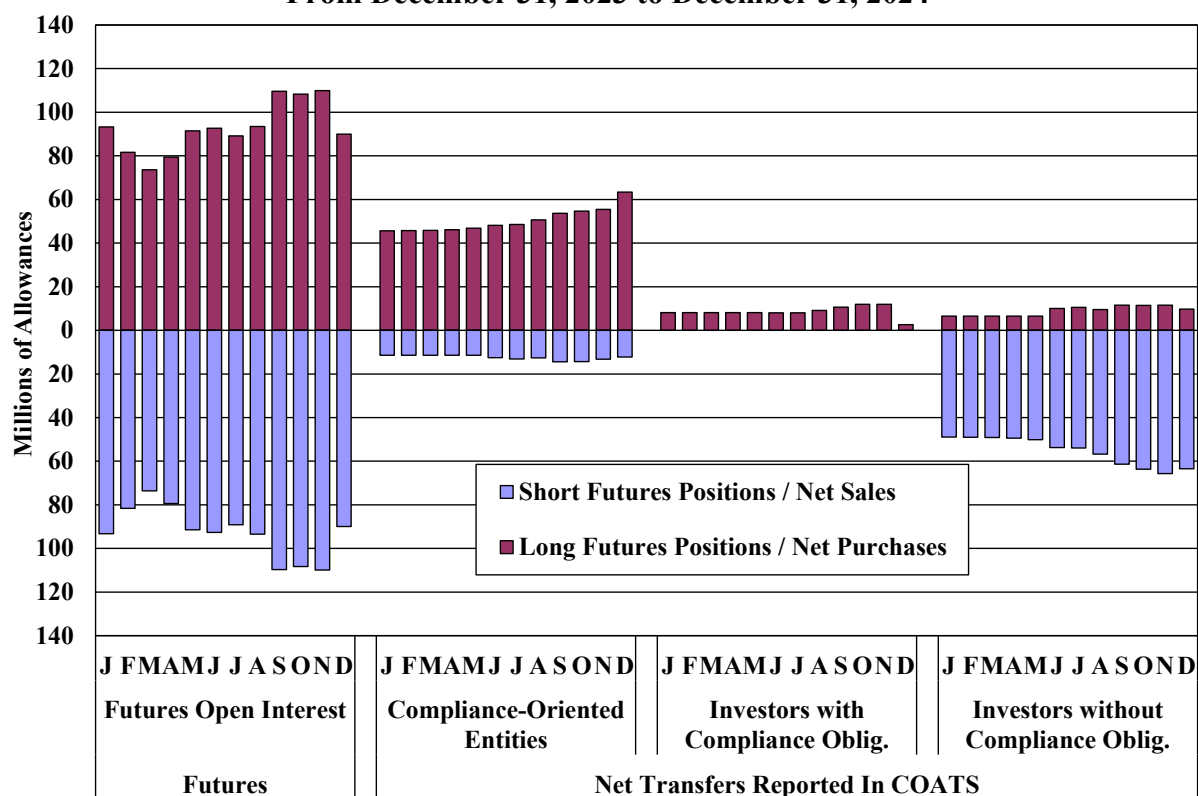


C. Acquisition of CO₂ Allowances in the Secondary Market

This section evaluates how the ownership of CO₂ allowances is affected by trading in the secondary market. Net changes in the ownership of CO₂ allowances are quantified in Figure 5 for 2024 using two measures: the open interest in ICE RGGI futures contracts and the net purchases and sales of CO₂ allowances by individual firms. Futures open interest is based on futures positions at the end of the last business day of each month, while net purchases and sales are based on registered holdings in COATS at the end of the last business day of each month. The figure reports net changes that have occurred since January 1, 2024.²⁸

²⁸ Open interest is defined in Section II.E. Net purchases/sales of CO₂ allowances by a particular firm include the net change in the amount of CO₂ allowances in a firm's COATS account that has resulted from trading (rather than the auctions or allocations). For example, if a firm purchases 100,000 CO₂ allowances from another firm, and then sells 30,000 allowances, the firm's net purchase of allowances would be 70,000.

**Figure 5: Net Changes in Futures Open Interest and Net Transfers of CO₂ Allowances
From December 31, 2023 to December 31, 2024**



Observations regarding the acquisition of CO₂ allowances in the secondary market:

- Open Interest in Futures – The net change in open interest of futures contracts from the beginning of 2024 peaked at about 110 million allowances on November 30 before falling to 90 million after the settlement of the benchmark contract.
- Net Transfers Reported by Compliance-Oriented Entities – Overall, compliance-oriented firms used the secondary market to increase their holdings in 2024, purchasing a net of 51 million allowances in 2024.
- Net Transfers Reported by Investors with Compliance Obligations – Investors with compliance obligations are reported separately from compliance-oriented entities because they have exhibited different transaction patterns in the past. Investors with compliance obligations on net purchased allowances; however they decreased their net holdings at the end of 2024.
- Net Transfers Reported by Investors without Compliance Obligations – Investment-focused entities without compliance obligations continued to be active in the secondary market in 2024. They used the secondary market primarily to decrease their allowance holdings during 2024. Collectively, these entities sold a net of 54 million allowances over the year, primarily to compliance-oriented entities.

- *Total Net Acquisition Reported in COATS* – The total net purchase of CO₂ allowances by firms that used the secondary market to increase their holdings in 2024 (about 42 million as shown in Figure 6) is much lower than the gross volume of transactions between unaffiliated firms (155 million as shown in Figure 4). This is because some firms have both purchased and sold CO₂ allowances in the secondary market such that the net change in their position is smaller than the total volume of their transactions. The total net purchase of CO₂ allowances by firms that increased their holdings was smaller than the 72 million CO₂ allowances that were acquired in the auctions in 2024. Some compliance entities relied primarily on the auctions to acquire CO₂ allowances in 2024, while others relied primarily or exclusively on the secondary market.

D. Patterns of CO₂ Allowance Holdings

Figure 6 below combines information on the acquisition of CO₂ allowances from the auctions and state allocations with information on the purchase and sale of allowances in the secondary market and the initial holdings of allowances on January 1, 2024. Together, this information provides a summary of the holdings of CO₂ allowances in COATS accounts according to whether the allowances was acquired: (i) prior to 2024, (ii) through the primary market in 2024, or (iii) through the secondary market in 2024. The figure shows holdings and emissions information for three categories of firm: compliance-oriented entities, investors with compliance obligations, and investors without compliance obligations.

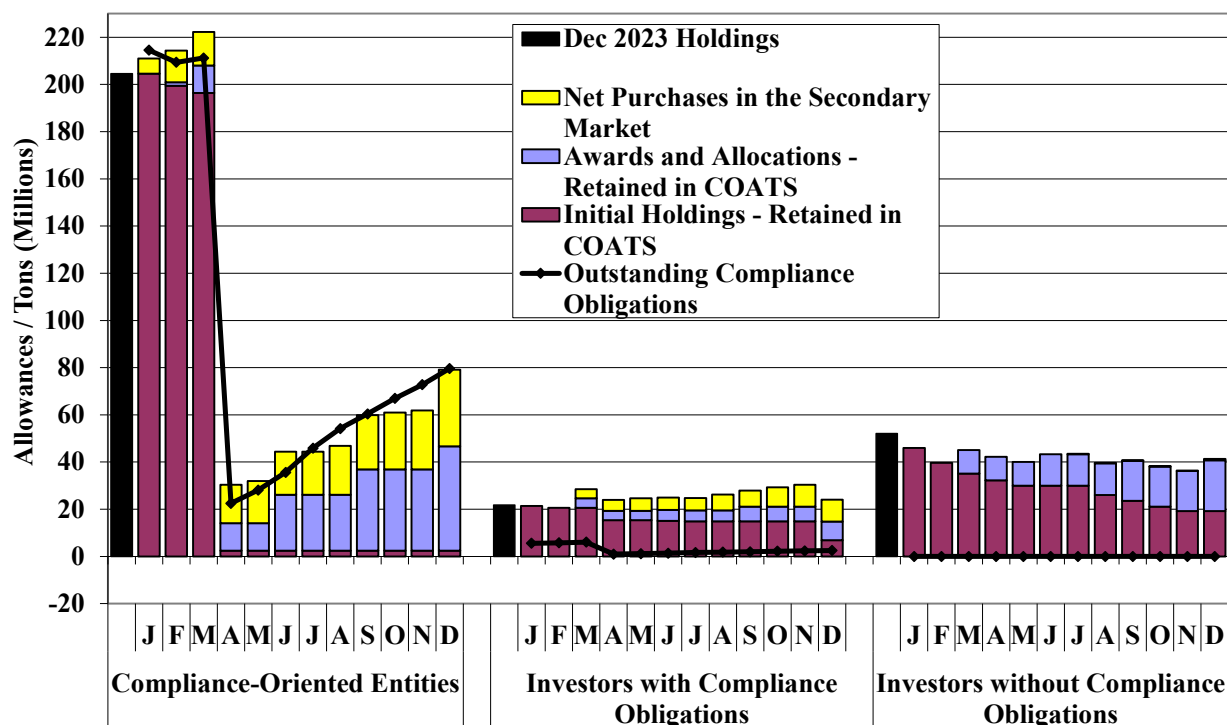
Figure 6 reports several categories of CO₂ allowances that are described below:

- *Net Purchases in the Secondary Market* includes CO₂ allowances that were held by the category of firm that purchased them in the secondary market after January 1, 2024.
- *Initial Holdings – Retained in COATS* includes CO₂ allowances that were held within a particular category of firm from the beginning of 2024. If a category of firm was a net seller of CO₂ allowances at any point in 2024, then the CO₂ allowances were first deducted from this holding category.
- *Awards and Allocations – Retained in COATS* includes CO₂ allowances that were still held by the category of firm that purchased them in an auction or acquired them through an allocation in 2024. If a particular category of firm was a net seller of CO₂ allowances in 2024, those allowances were deducted from this category after any initial holdings were exhausted.

For each category of firm, holdings of CO₂ allowances in COATS are equal to the sum of three categories: *Initial Holdings – Retained in COATS Account*, *Awards and Allocations – Retained in COATS Account*, and its *Net Purchases in Secondary Market*. Figure 6 shows the three

categories of CO₂ allowances at the end of each month in 2024. The figure also shows the cumulative compliance obligations for compliance entities at the end of each month in 2024.

**Figure 6: Sources of CO₂ Allowances Held in COATS Accounts
2024**



Observations regarding registered CO₂ allowance holdings in Figure 6:

- *Holdings by Compliance-Oriented Entities* – Two hundred and seventy-eight million CO₂ allowances were in circulation at the beginning of January 2024. Of these, 205 million (about 73 percent) were held by compliance-oriented entities. These firms remained active in purchasing allowances throughout the year, but they also surrendered 202 million for fifth control period compliance by April 2024. At the end of 2024, the number of allowances held by compliance-oriented entities was 79 million.
- *Holdings by Investors with Compliance Obligations* – Approximately 22 million of the CO₂ allowances in circulation at the beginning of 2024 were held by investors with compliance obligations. These firms surrendered about 5 million allowances to satisfy their fifth control period compliance obligations. At the end of 2024, these firms held 24 million.
- *Outstanding Compliance Obligations from the Fifth Control Period* – As of the end of December 2024, just one facility (with a deficit of 304 thousand allowances) has not

surrendered a sufficient number of allowances to cover its obligations during the fifth control period.²⁹

- *Holdings by Investors without Compliance Obligations* – The share of allowances held by these entities increased from 19 percent at the beginning of 2024 to 29 percent at the end of the year. At the end of 2024, entities without compliance obligations held 41 million of the allowances in circulation. Investors without compliance obligations acquired most allowances through the auctions (21 million) in 2024.
- *Surrenders of Allowances for Compliance* – By April, 207 million allowances had been transferred to surrender accounts for fifth control period compliance.

²⁹ The compliance obligations and emissions discussed in this report do not exclude Maryland Limited Industrial Exemption Set-aside Account source(s). Therefore, the outstanding number of allowances yet to be surrendered, as reported here may also be higher than the final requirement. For detailed information regarding outstanding compliance obligations for the fifth control period, see the Compliance Summary report located at rggi-coats.org.

V. PARTICIPATION IN THE CO₂ ALLOWANCE MARKET

This section evaluates participation by individual firms in the CO₂ allowance market.

Participation by many firms promotes competition and helps ensure that CO₂ allowance prices are determined efficiently. Over time, firms that need CO₂ allowances for compliance should be able to acquire them through the auctions and/or the secondary market, and the holdings of individual firms should be relatively consistent with their potential uses for allowances.

This section evaluates the level of participation by individual firms in four ways: (i) the demand for allowances by individual firms, (ii) the breadth of participation in the quarterly auctions, (iii) the holdings of individual firms relative to their demand for allowances, and (iv) the breadth of participation in the trading of allowance futures contracts.

Key observations regarding participation in the CO₂ allowance market:

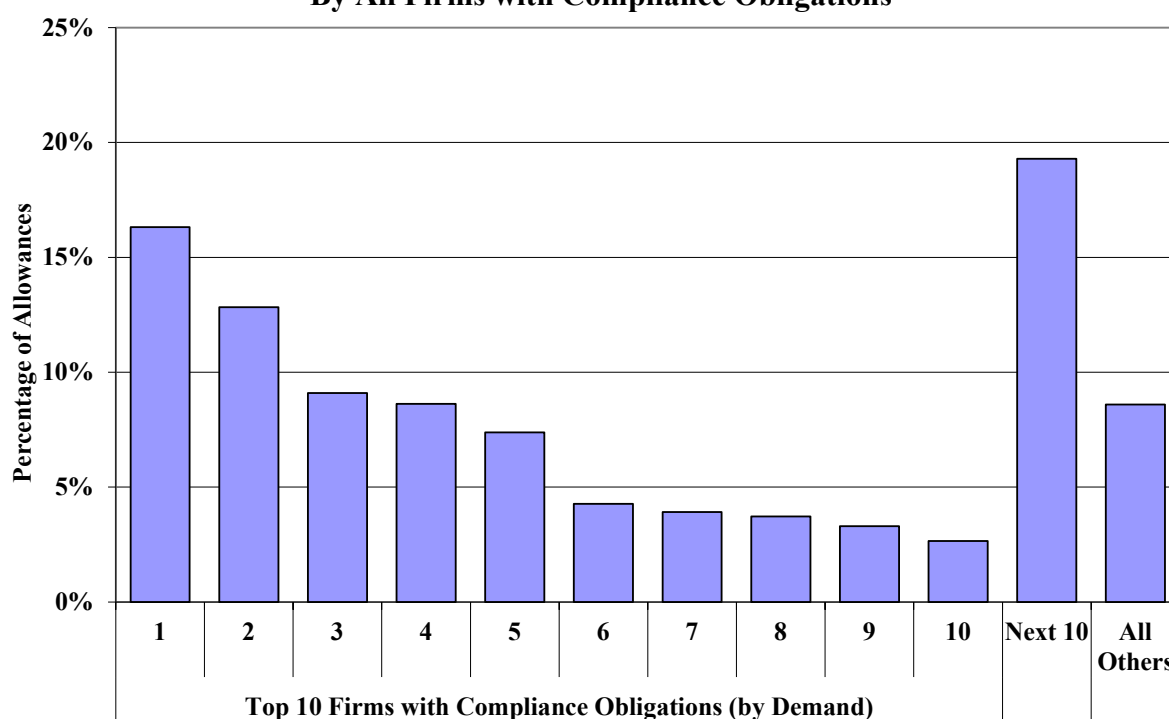
- *Demand for CO₂ Allowances* – The demand for CO₂ allowances is dispersed widely across firms, leading large numbers of firms to participate in the auctions. The three firms with the largest compliance obligations accounted for 38 percent of the total projected demand and the top ten accounted for 72 percent.
- *Participation in the Auctions* – In 2024, the average number of compliance-oriented entities submitting bids dropped to 38 from 39 while the average number of participating investors fell to 16 from 17 in 2023.
- *Participation in the Derivatives Market* – The number of firms with reportable positions in RGGI futures and options peaked in 2024 with 75 traders compared to the previous record of 63 traders in 2023.
- *Distribution of CO₂ Allowances Awarded* – Auction awards were widely distributed across different types of firms as the top ten (by awards) compliance-oriented entities accounted for 60 percent of the total awarded, while the top ten (by awards) investors accounted for 29 percent.
- *Distribution of CO₂ Allowance Holdings* – Holdings are distributed widely across firms. The ten compliance-oriented entities with the largest outstanding obligations accounted for 39 percent of the total holdings and other compliance-oriented entities with smaller outstanding obligations accounted for 15 percent of holdings at the end of 2024. The share of allowances held collectively by the ten investors with the largest holdings increased from 21 percent at the end of 2023 to 41 percent at the end of 2024.
- *Concentration of Futures and Options Holdings* – Many firms have open interest in RGGI CO₂ allowance futures and options, but a relatively small number of firms account for large shares of the net long and short positions futures contracts. During 2024, four

firms accounted for an average of 34 percent of the total net long positions in ICE Vintage 2024 contracts, while four firms accounted for an average of 59 percent of the total net short positions in ICE Vintage 2024 contracts.

A. Demand for CO₂ Allowances

The following figure summarizes the projected demand for CO₂ allowances of individual compliance entities at the end of 2024. We project the demand of each compliance entity for CO₂ allowances based on historical CO₂ emissions patterns and expected changes in future market conditions. The projected demand is shown for each of the top ten compliance entities (i.e. the ten firms with the highest projected demand), the second ten compliance entities as a group, and all other compliance entities as a group. The projected demand is reported in Figure 7 as a percentage of the total projected market demand.

**Figure 7: Estimated Demand for CO₂ Allowances
By All Firms with Compliance Obligations**



Observations regarding demand for CO₂ allowances:

- Demand for CO₂ Allowances – The demand for CO₂ allowances is dispersed relatively widely across firms. The three compliance entities with the largest compliance obligations account for 38 percent of the total projected demand. The top ten compliance entities account for 72 percent of the total projected market demand, while the next ten

compliance entities account for about 19 percent, and compliance entities that are not among the top 20 account for 9 percent.

- *Concentration of Demand* – The concentration of demand by compliance entities increased following the expansion of RGGI to include Virginia in 2021. Thus, with Virginia’s departure from RGGI beginning in 2024, the concentration of demand by compliance entities is diminished.

B. Participation in RGGI Auctions

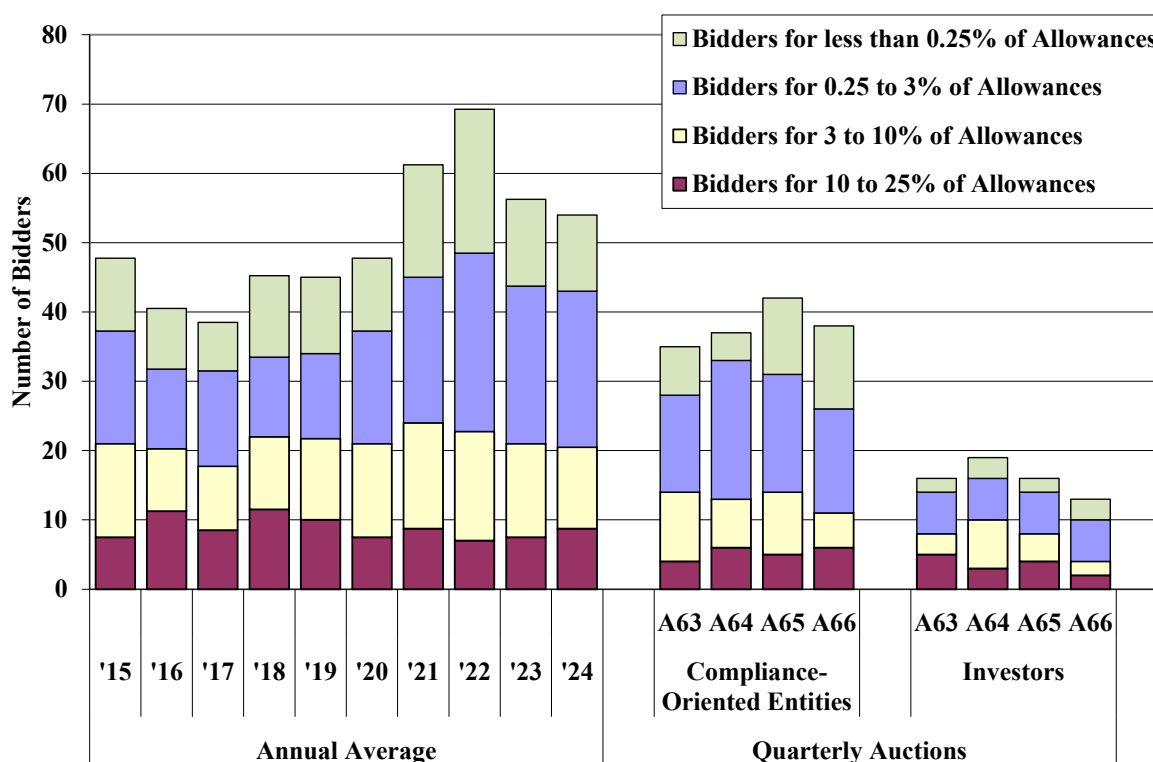
The following figure summarizes the breadth of participation in the four auctions during 2024. The figure reports the number of firms that submitted bids in each auction. For 2024, the number of bidders is shown separately based on whether the bidder is a compliance-oriented entity or an investor in the RGGI marketplace. The figure shows these quantities averaged across the auctions in each year from 2015 to 2024.³⁰

Observations regarding participation in the RGGI auctions:

- *Participation* – In the 2024 auctions, the number of bidders ranged from 51 to 58 and averaged 54, a lower average than the number of bidders in the 2023 auctions. The number of compliance-oriented entities submitting bids decreased from an average of 39 in 2023 to 38 in 2024, while the number of participating investors decreased from 17 in 2023 to 16 in 2024.
- *Large and Small Bidders* – The number of large bidders (i.e., firms submitting bids for more than three percent of the allowances in a current control period offering) averaged 21 in 2024, similar to 2023. The average number of small bidders (i.e., firms submitting bids for up to three percent of allowances offered for sale) was 34, close to the level of participation in 2023.
- *Competition* – Participation by a large number of firms promotes competition and helps ensure that the auction clearing price reflects the market value of CO₂ allowances. The levels of participation in 2024 were overall slightly lower than those in 2023. We found no material evidence of anti-competitive conduct or significant barriers to participation in our reviews of the bids and the qualification process of each auction.

³⁰ For example, if 13.5 million CO₂ allowances were offered in an auction, a firm that submitted bids for 200,000 allowances would be counted in the “0.25 to 3 percent” category, since $200,000 \div 13.5 \text{ million} = 1.5 \text{ percent}$.

**Figure 8: Number of Bidders According to the Quantity of Bids Submitted
Auctions for Current Control Period Allowances**



C. Acquisition of CO₂ Allowances by Individual Firms

In a well-functioning market, we expect a compliance-oriented firm to purchase a number of CO₂ allowances that is generally consistent with its demand. An investor is more likely to hold a number of CO₂ allowances exceeding its demand for extended periods. Individual firms may purchase a larger or smaller share according to how the current price of CO₂ allowances compares to their expectations of allowance prices in the future. Firms that believe CO₂ allowances are currently undervalued can be expected to purchase a larger share, while firms that believe allowances are overvalued can be expected to purchase a smaller share. Thus, competition by many firms helps ensure that the current price of CO₂ allowances in the auctions and in the secondary market reflects reasonable expectations.

The following two figures examine the distribution of CO₂ allowances across individual firms following the twelfth full year of the RGGI market's operation. Figure 9 illustrates how broadly CO₂ allowances were distributed in the auctions, while Figure 10 illustrates how the holdings of

allowances in COATS accounts were distributed after the close of 2023. The figures show that CO₂ allowances have generally been acquired by firms in quantities that are consistent with their demand, which is a positive indicator regarding the competitiveness of the market.

Figure 9 reports the average quantities of CO₂ allowances that were awarded to firms in the auctions in 2023 and 2024. The awards are shown for each of the top ten compliance-oriented entities (i.e. the ten firms with the highest projected demand) and for each of the top ten investors (i.e., the ten firms with the largest total awards). Compliance-oriented entities are ranked in descending order based on total awards rather than demand. The table also shows the level of awards given to remaining (not included in the top 10) firms in each category as a group.

**Figure 9: Distribution of Auction Awards
2023 – 2024**

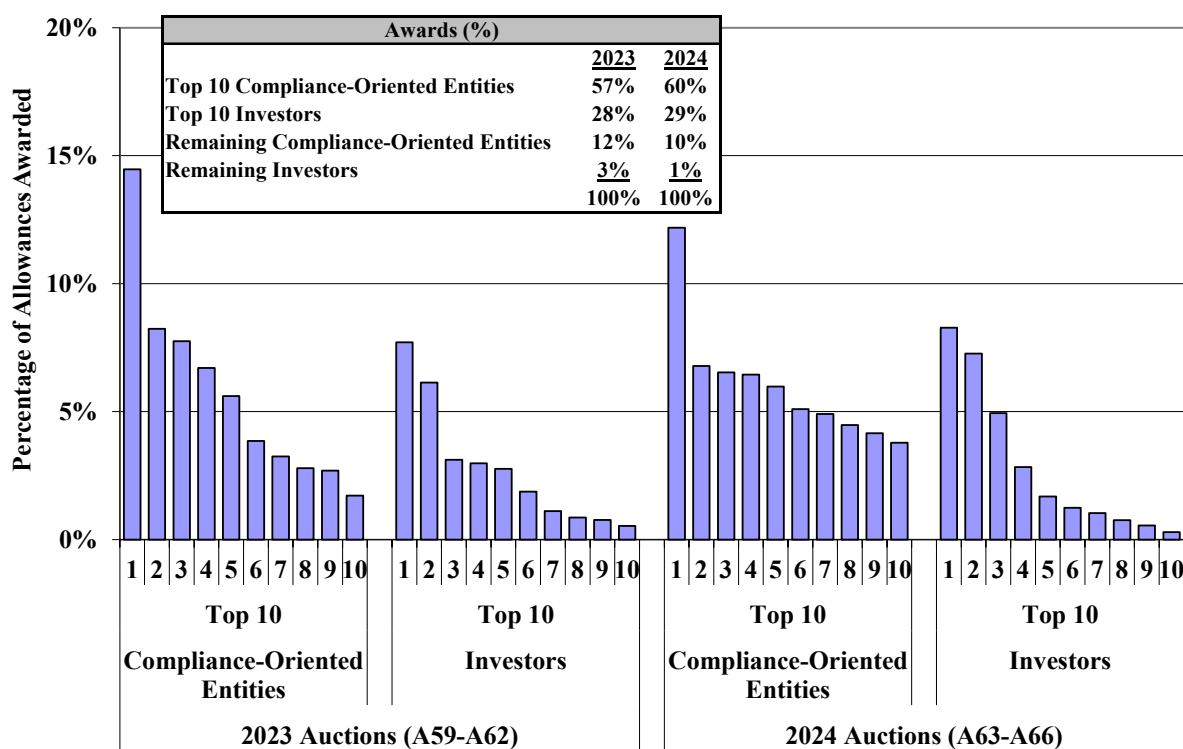
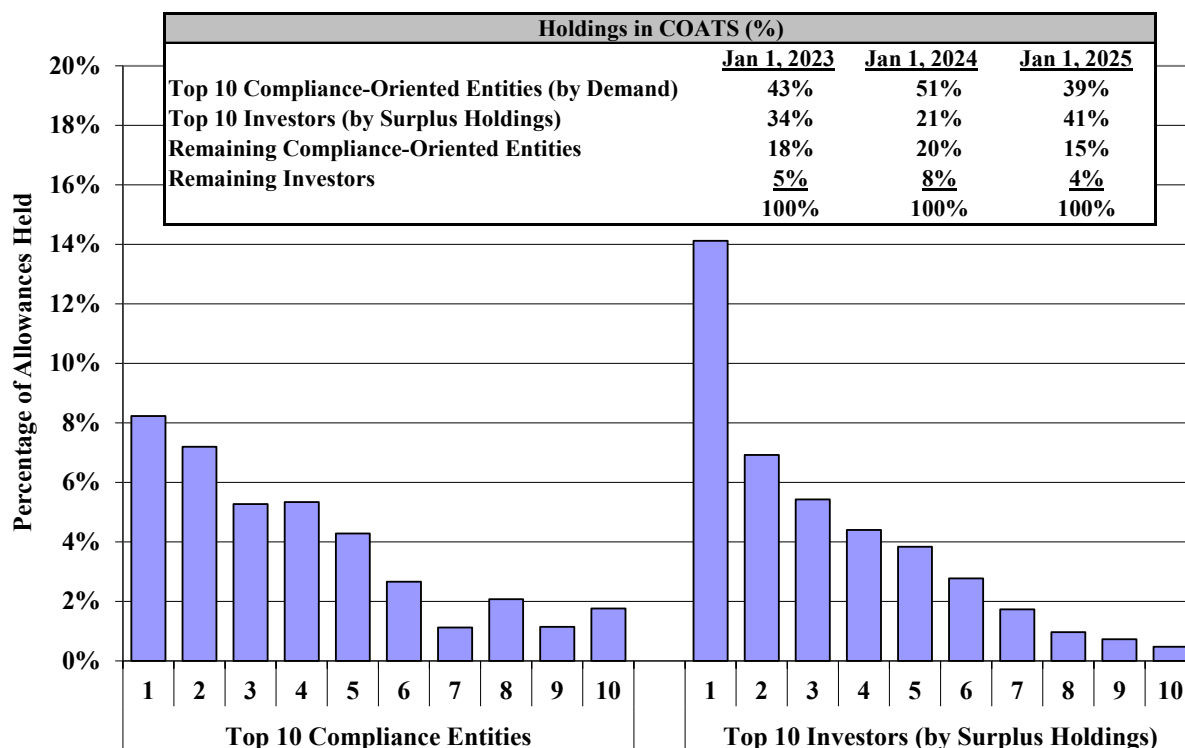


Figure 10 reports the quantities of CO₂ allowances that were held in the COATS accounts of individual firms at the beginning of January 2025, following the delivery of contracts dated for December 2024 delivery. The holdings are shown for each of the top compliance-oriented entities (i.e. the ten firms with the highest projected demand) and for the top ten investors. The

top ten investors are ranked in descending order based on total holdings rather than demand. The table also shows the level of holdings of the remaining (not included in the top ten) compliance-oriented entities as a group and investors as a group.

**Figure 10: Distribution of CO₂ Allowance Holdings
January 1, 2024**



Observations regarding the distribution of CO₂ allowances:

- *Distribution of CO₂ Allowances Awarded* – The share of awards allocated to the top ten compliance-oriented entities increased from 57 percent in 2023 to 60 percent in 2024, while the share of awards allocated to the top ten investors increased from 28 percent in 2023 to 29 percent in 2024.
- *Distribution of CO₂ Allowance Holdings Among Compliance-Oriented Firms* – The holdings of CO₂ allowances were distributed across compliance-oriented entities at the close of 2024 at levels that were generally consistent with their demand, and a small number of these entities owned a moderate surplus. The share of holdings of the top ten compliance-oriented entities was 39 percent at the end of 2024, while the share of holdings of smaller compliance-oriented entities was 15 percent. Compliance share of holdings was larger in 2023 in part because it was the last year in a control period, and it was the last year for Virginia’s participation in RGGI.

- *Distribution of CO₂ Allowance Holdings Among Investors* – The share of allowances held by the top ten investors was 41 percent at the end of 2024. The share was lower in 2023 because compliance-oriented firms acquired additional allowances from investors in anticipation of the end of the fifth control period thereby reducing investor holdings. The distribution of allowance holdings amongst investors is consistent with competitive expectations given that the private bank of allowances far exceeds the outstanding compliance demand of firms for the fifth control period. The large surplus makes it more difficult for one firm or a small number of firms to hoard allowances.

D. Participation in the CO₂ Allowance Futures Market

Additional information about the trading of futures, forwards, and options is available in the weekly Commitments of Traders (“COT”) reports, which are published by the Commodity Futures Trading Commission (“CFTC”) ³¹ for each week when greater than 20 firms have reportable positions in a particular product.

Figure 11 summarizes the concentration of open interest in Vintage 2024, and 2025 ICE futures and options contracts during months when information was available from the CFTC. The figure reports the average monthly net long positions in three categories: (i) the four firms with the largest long positions, (ii) the four firms with the largest long positions not including the Top 4 (see “Next 4 Firms”), and (iii) all other long positions. The figure also reports the average monthly net short positions for three categories.

Figures 12 and 13 summarize the concentration of open interest in Vintage 2024 and 2025 ICE futures and options and the number of firms participating in the market for those contracts, respectively. The figures show similar aggregations by category of trader including producers/merchants, swap dealers, money managers, spread, and unspecified or other as defined by the CFTC:

- *Producers/Merchants* – Firms that hold the “physical commodity and use the futures markets to manage or hedge risks associated with those activities,”
- *Swap Dealers* – Firms that “deal primarily in swaps for a commodity and use the futures markets to manage or hedge the risk associated with those swaps transactions. The swap

³¹ Each day, firms with an open interest of 25 contracts or more are required to report their positions to the CFTC. Each Tuesday, the CFTC publishes the COT report, which summarizes the positions of market participants.

dealer's counterparties may be speculative traders, like hedge funds, or traditional commercial clients that are managing risk arising from their dealings in the physical commodity,"

- *Managed Money* – “Investors that are generally seeking exposure to a broad index of commodity prices as an asset class in an unleveraged and passively-managed manner,”
- *Spread (Figure 12)* - Traders with offsetting short and long positions, and
- *Unspecified (Figure 13) or Other (Figure 12)* – Firms with reportable positions not included in the other categories.

Figure 11: Concentration of Open Interest in Futures and Option

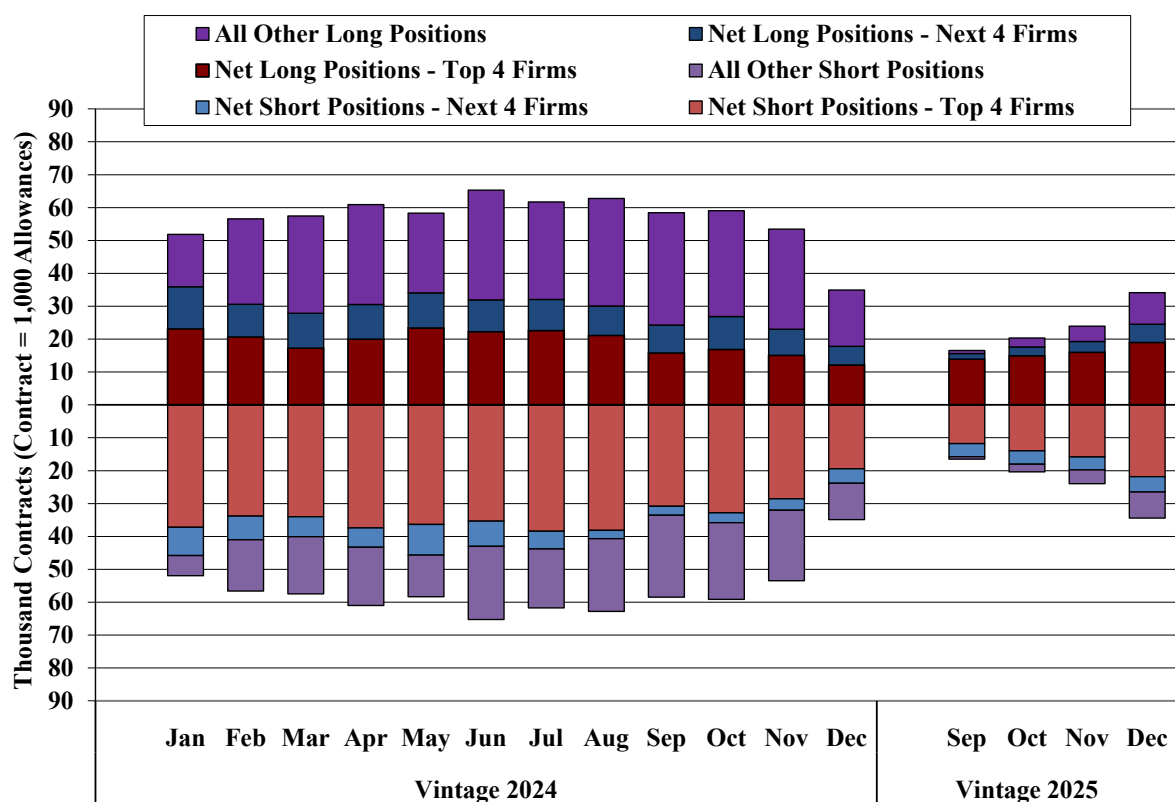


Figure 12: Concentration of Open Interest in Futures and Options by Trader Type

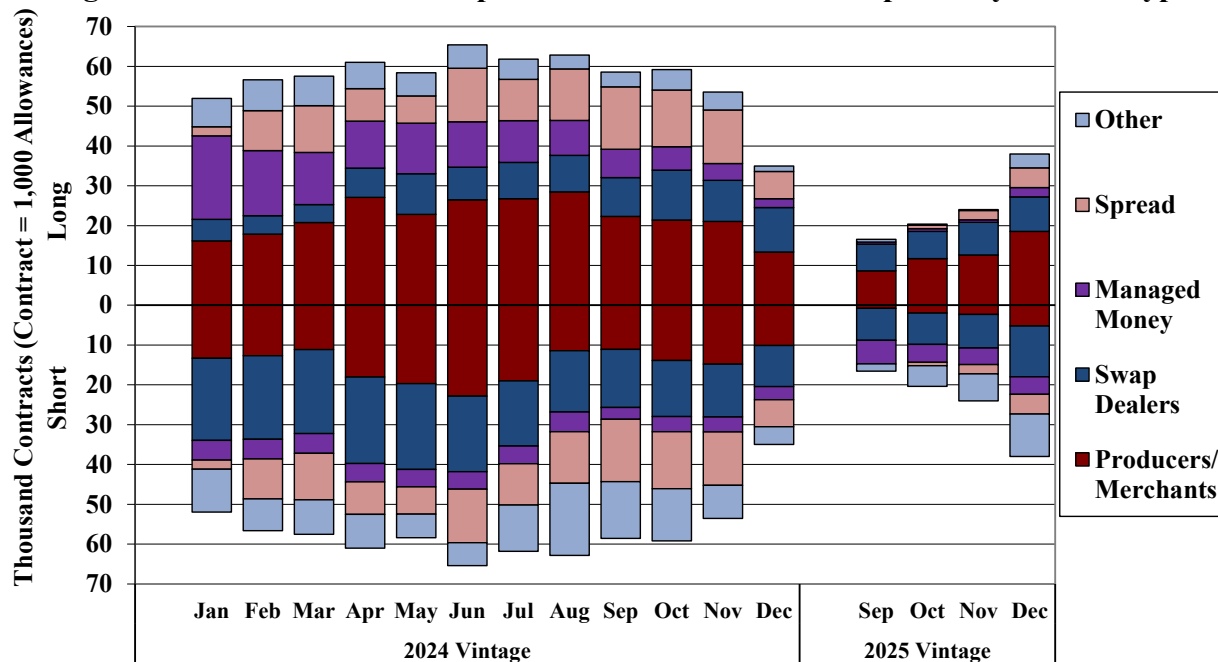
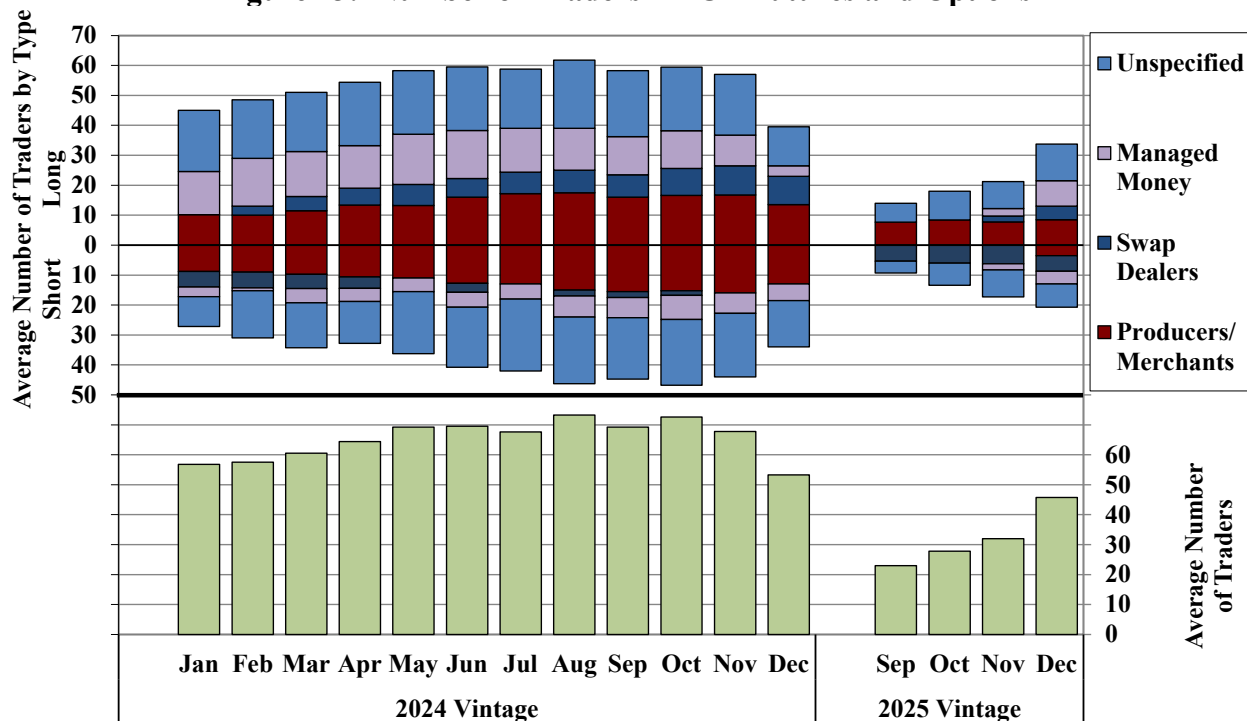


Figure 13: Number of Traders in ICE Futures and Options



Observations regarding the concentration of open interest in futures and options contracts and participation in the market by individual firms:

- Number of Participants – The number of participants in the market for ICE vintage 2024 derivatives with reportable positions rose gradually during the year but fell off at the end of the year as contracts expired and activity increased for Vintage 2025 contracts. The number of swap dealers and producer/merchants with long positions increased during the course of the year, as the number of managed money firms fell off..
- Concentration of Ownership – Many firms have open interest in RGGI CO₂ allowance futures and options, although a small number of firms account for large shares of the net long and short positions in Vintage 2024 contracts. The net long positions of the top four firms accounted for an average of 34 percent of the total long positions in Vintage 2024 contracts, while the net short positions of the top four firms accounted for an average of 60 percent of the total short positions. Starting in April, following the depletion of the CCR in the March auction, open interest in Vintage 2024 increased and peaked in August. This coincided with a general ramp up of secondary prices during this period, and producers/merchants maintained a larger share of long positions during that period. Swap dealers maintained a large short position throughout the year for both Vintage 2024 and Vintage 2025 contracts..
- Contract Vintage – Open interest in Vintage 2024 contracts peaked in June before falling as traders switched into Vintage 2025 contracts starting in September.

VI. DISCUSSION OF MARKET MONITORING

As the RGGI Market Monitor, we evaluate the conduct of market participants in the auctions and in the secondary market to identify potential anti-competitive conduct. We also assess whether the auctions were administered properly by the auction administrator.

Participation in the auctions by a large number of firms promotes competition and helps ensure that the auction clearing price reflects the market value of allowances. Hence, the participation by a substantial number of firms as observed in Figure 8 is a positive indicator regarding the competitiveness of the first 62 auctions. We have found no material evidence of anti-competitive conduct or significant barriers to participation in our reviews of the bids and the qualification process for each product in each auction. We also found that the auctions were conducted in accordance with the noticed rules and bids received.

In our monitoring of the secondary market, we evaluate whether firms could potentially hoard a substantial share of the supply of allowances to influence prices or to prevent a competitor from obtaining allowances. Based on our review of the holdings of individual firms, we find no evidence that hoarding is a significant concern, and that the holdings of individual firms are generally consistent with their expected need for allowances over the current control period. Figure 6 shows that compliance-oriented entities as a group hold a quantity of allowances consistent with their obligation thus far for the fourth control period, while Figure 10 demonstrates that the allowances are adequately distributed across the COATS accounts of individual compliance-oriented entities.

Another potential concern is that a firm expecting to purchase CO₂ allowances in the auction might sell a large number of futures contracts in an effort to push prices in the secondary market below the competitive level. Such a firm might profit from buying a large number of CO₂ allowances in the auction at a discount if the bidding in the auction were influenced by the depressed futures price. For this to be a profitable strategy, the firm would need to be able to substantially depress the futures price with a relatively small amount of sales—an amount smaller than the amount of CO₂ allowances it planned to buy in the auction. The best protection against this strategy is a market where other firms respond by making additional purchases.

Firms that are looking for an opportunity to reduce their short positions or to purchase CO₂ allowances for their future compliance needs help limit the effectiveness of a strategy to depress prices below the competitive level. Such firms have a strong incentive to make additional purchases if a firm deliberately attempts to depress the futures price.

We have found no material evidence of anti-competitive conduct or significant barriers to participation in the auctions and in the secondary market, and we have found that price variations are generally driven by reasonable expectations related to the long-term supply and demand for allowances.