

Comments on « Carbon pricing and credit reallocation »

by J. Arlinghaus, C. Bittner, M. Götz and N. Koch (2023)

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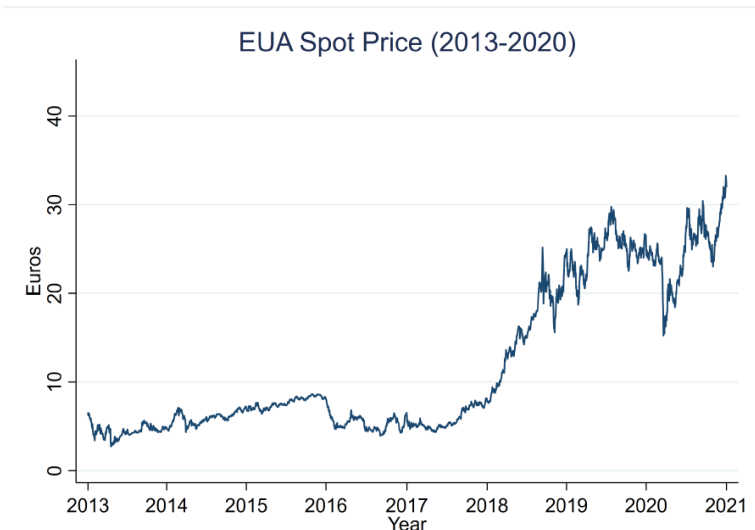
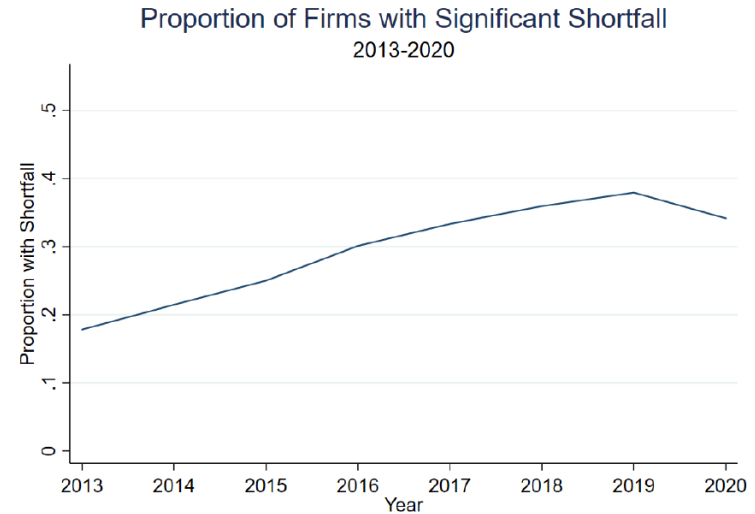
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This paper

- Investigating interplay between reform of EU cap-and-trade scheme for carbon emissions (EU-ETS), credit demand by ETS participants and bank credit supply to ETS firms following ECB's NIRP.
- Simple partial equilibrium model of firm profits: credit demand
 - firms covered by EU-ETS demand more credit in order to invest in low-carbon tech or purchase allowances upfront if rising carbon price expected
 - Investment in low carbon tech increases profitability of these firms
- Empirical test using German credit register (2013-2015Q1): credit supply
 - June 2014 NIRP used as instrument for identifying positive credit supply shock by high-deposit banks
 - DDD regressions: more credit for ETS firms (than for non-ETS firms) by high-deposit banks after NIRP. Rationale: ETS firms are *less* risky, cf. model.

Some context: EU-ETS Phase 3 and carbon pricing

- Exploratory phases (2005-2007, 2008-2012): price almost zero
- **Phase 3 (2013-2020)**
 - Cap in allowances decreases by 1,74% annually
 - Allowances distribution: auctions instead of free allotment
 - Free permits: from 80% to 30% in 2020 (manufacturing), no free permits for utilities (with exceptions)
- Many firms facing a permit shortfall (FA/VE < 50%)
- **Rocketing carbon price in 2018**



Literature: impact of cap-and-trade and banks

- Bolton, Lam, Muûls (2022): carbon price increases during phase 3 (notably 2018-20) \Rightarrow lower stock returns for firms with *permit shortfalls*.
 - but not much real effects (decrease in regulated emissions but not scope 1 or 2, **no visible impact on investment and R&D**)
- Colmer, Martin, Muûls and Wagner (2020): Phase 2 of EU-ETS induced a reduction in emissions by French regulated firms (DinD). **Anti-pollution investments reduced carbon intensity of VA**, not VA.
- Ivanov et al (2023): passage of cap-and-trade bill in California \Rightarrow banks reduce their exposure to high-emitting firms (facing lower future profits) by cutting credit lines and granting shorter maturity loans.
- Degryse, Roukny, Tielens (2022): innovative green firms exert a negative externality on brown firms. Lenders with a large exposure to brown firms (legacy position at risk) ration credit to green firms.

Some context: Eurosystem's NIRP

ECB cuts DFR to -0,10% in June 2014. Available evaluations:

- Heider, Saidi, Scheppens (2019): NIRP induces high-deposit banks to lend *less* (syndicated loans) and to increase *risk shifting*.
- Bottero et al (2022): Italian banks with higher net interbank assets ex ante lend more to firms. Increased *risk taking* when the banks are lowly capitalized, but no zombie lending.
- Bittner et al (2022): high-deposits German banks *increase* their lending to *risky*, not safe firms.
- Altavilla et al (2022): euro area banks pass NIRP on to negative rates on (large) corporate deposits, prompting firms to invest more.

NB: here, German HD-banks *supposed* to lend more and suggestive evidence that take less risk when tilt lending towards EST firms. Consistent?

Main comment: what is the main research question?

- **Q1: does rising carbon price push ETS firms to invest in clean tech?**
 - Cf. theory part. Is borrowing always needed here?
 - Treated firms = ETS firms with ex ante permits shortfall (low annual ratio free allowances/emissions) vs Control firms = other ETS firms
 - Dependent variable: CAPEX/A, R&D/A, CO2 emissions...
 - Price shock:
 - 2013 = expected price increase (switch to phase 3)
 - 2018 = realized price increase

Caveat: done already to some extent, cf. [Bolton, Lam and Muûls \(2022\)](#), [Colmer, Martin, Muûls and Wagner \(2020\)](#)

Research question? (2)

- **Q2: do financial constraints impede decarbonization of (most) polluting firms in a (constraining) cap-and-trade scheme?**
 - Idea: possible conflict between incentives within ETS and credit rationing by some banks over some period of time
 - Most polluting ETS firms may be firms with permit shortfalls, more exposed to carbon price surge (lower profits). Hence, more difficult for them to raise money from banks (cf. [Ivanov et al., 2023](#))
 - May explain why carbon price increases not associated with more investment by shortfall firms in Phase 3 (cf. [Bolton et al, 2022](#))

Research question (3): tackling Q2 in three steps

- **Step 1: do “treated” (permit shortfall) ETS firms need more credit in phase 3 (when carbon price rises) ?**
 - DiD regression of bank-firm credit on dummy for permit shortfall (interacted with carbon price inflation or cross section around 2018), controlling for bank FE
 - Alternative DV: use credit rationing indicators from SAFE?
- **Step 2: are shortfall ETS firms financially constrained during phase 3?**
 - Standard firm-level metrics of FC: high leverage, no dividend payments, high KZ index...

Research question (3): tackling Q2 in three steps

- **Step 3: Does NIRP relax financial constraint to some extent by inducing positive credit supply shock?**
 - Idea: what if main bank = bank with high ratio of retail deposits to assets during NIRP (2014-2019)?
 - Run preliminary test of credit supply shock: Khwaja-Mian-type DiD regression of bank-firm credit on dummy for HD banks (All manuf and energy firms, ETS, non-ETS...)
 - Main test:
$$Y_{ft} = \beta \cdot SHORTFALL_f \cdot HDMAINBANK_f \cdot POST_t + \dots$$
where $Y = [\text{CAPEX}, \text{R\&D}, \text{GHG emissions} \dots]$
 - Caveat: ex ante assortative matching between firms and banks?

Other comments

- Model:
 - Why impose clean-up costs on non-ETS firms?
 - Other modelling approaches may be better advised for credit supply: Holmström-Tirole (1997) set-up (cf. [Degryse et al., 2022](#))?
- Descriptive stats on banks in your sample would be welcome
- Regressions:
 - Why don't you control for firm covariates in columns 1-2 of regression tables? Include also firm size. Industry FE > firm FE ?
 - Table 2, col. 1 (raw data): no average effect of $Post*D/A$; lower average credit exposure of high D/A banks to ETS firms... - Table 6, col. 1 (matched data): no average effect of NIRP, nor of $Post*D/A$...
 - Explain why such short-lived impact (2 quarters) in Figure 1

Conclusions

- A very stimulating project tackling a potentially important issue as EU-ETS faces new upcoming reforms
- Preliminary version at this stage: right time to sharpen main research question
- Would advise you to focus on empirics or split paper.

Thank you!