

# The Long-Term Impact of the Market Stability Reserve on the EU Emission Trading System

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## Abstract

To provide a strong price signal for greenhouse gas emissions abatement, Europe decided to strengthen the European Union Emissions Trading System (EU ETS) by implementing a market stability reserve (MSR) that includes a cancellation policy and to increase the linear reduction factor from 1.74% to 2.2% after 2020. Results of a detailed long-term investment model, formulated as a large-scale mixed complementary problem, show that this strengthened EU ETS may quadruple EUA prices and may decrease cumulative CO<sub>2</sub> emissions with 21.3 GtCO<sub>2</sub> compared to the cumulative cap before the strengthening (52.2 GtCO<sub>2</sub>). Around 40% of this decrease (8.3 GtCO<sub>2</sub>) is due to the increased linear reduction factor and 60% due to the cancellation policy (13 GtCO<sub>2</sub>). Without the increased linear reduction factor, the MSR's cancellation policy would decrease emissions by only 4.1 GtCO<sub>2</sub>, indicating their complementarity. A sensitivity analysis on key model assumptions and parameters reveals that the impact of the MSR is, however, strongly dependent on other policies (e.g., renewable energy targets, nuclear, lignite and coal phase-outs) and cost evolutions of abatement options (e.g., investment cost reductions for wind and solar power). This renders the effective CO<sub>2</sub> emissions cap highly uncertain. In our simulation results, cancellation volumes range between 5.6 and 17.8 GtCO<sub>2</sub>, which is to be compared with our central estimate of 13 GtCO<sub>2</sub>. We calculate the required linear reduction factors to achieve these CO<sub>2</sub> emission reductions without an MSR, which would remove all uncertainty on the cumulative CO<sub>2</sub> emissions and interference with other complementary climate or energy policies.

*Keywords:* European Emission Trading System, Market Stability Reserve, Carbon Price, Electricity Generation, Mixed Complementarity Problem, Alternating Direction Method of Multipliers

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## Nomenclature

### Sets

$\mathcal{D}$	Set of representative days, indexed by $d$ .
$\mathcal{H}$	Set of hourly time steps, indexed by $h$ .
$\mathcal{M}$	Set of months, indexed by $m$ .
$\mathcal{P}$	Set of conventional power plant technologies, indexed by $p$ , with cardinality $N^{\mathcal{P}}$ .
$\mathcal{R}$	Set of renewable electricity generation technologies, indexed by $r$ , with cardinality $N^{\mathcal{R}}$ .
$\mathcal{Y}$	Set of years, indexed by $y$ , with cardinality $N^{\mathcal{Y}}$ .

### Variables

$b_{y,p}^{\mathcal{C}}, b_y^{\mathcal{I}}$	EUAs procured in year $y$ for CO <sub>2</sub> emissions caused by conventional electricity generation technology $p$ (C) or industry (I), tCO <sub>2</sub> .
$c_{y,m}^{\text{MSR}}$	Cancellation of EUAs in month $m$ of year $y$ , tCO <sub>2</sub> .
$cp_{y,p}^{\mathcal{C}}, cp_{y,r}^{\mathcal{R}}$	Capacity investment in power plant technology $p$ or RES-based generation $r$ in year $y$ , MW.
$e_y^{\mathcal{I}}$	CO <sub>2</sub> emissions of the energy-intensive industry in year $y$ , tCO <sub>2</sub> .
$g_{y,d,h,p}^{\mathcal{C}}, g_{y,d,h,r}^{\mathcal{R}}$	Output associated with power plant technology $p$ or RES $r$ in hour $h$ of day $d$ of year $y$ , MWh.
$g_{y,r}^{\mathcal{R},\text{NB}}$	Annual output associated with newly constructed RES-based technology $r$ in year $y$ , MWh.
$\lambda_y^{\text{ETS}}$	Emission allowance price in year $y$ , €/tCO <sub>2</sub> .
$\lambda_{y,d,h}^{\text{EOM}}$	Energy price in hour $h$ of representative day $d$ of year $y$ , €/MWh.
$\lambda_y^{\text{REC}}$	Renewable energy certificate (REC) price in year $y$ , €/MWh.
$msr_{y,m}$	Content of the MSR in month $m$ of year $y$ , tCO <sub>2</sub> .

$R^{\text{EOM},i}, R^{\text{REC},i}, R^{\text{ETS},i}$	Primal residuals on the energy only market, renewable certificates auctions and ETS auctions in iteration $i$ , MWh or tCO <sub>2</sub> .
$R_p^{\text{C},i}, R_r^{\text{R},i}, R^{\text{IND},i}$	Dual residuals on the strategies of conventional generator $p$ , renewable generator $r$ or the energy-intensive industry in iteration $i$ , €.
$S_y$	Supply of EU emission allowances after correction for transfers to and from the market stability reserve in each year $y$ , tCO <sub>2</sub> .
$tnac_y$	Total number of allowances in circulation at the end of each year $y$ , tCO <sub>2</sub> .
$x_{y,m}^{\text{MSR}}$	Inflow or outflow of the MSR in month $m$ of year $y$ , tCO <sub>2</sub> .
<i>Parameters</i>	
$\delta$	Tolerance of the ADMM algorithm.
$\delta_y$	Inflow of back-loaded or unallocated allowances to the MSR in year $y$ , tCO <sub>2</sub> .
$\rho$	Parameter controlling the price update step size in the ADMM algorithm.
$A_y, A_y^{\text{SP}}$	Discount factor, calculated as $\frac{1}{(1+r)^y}$ with $r$ the discount rate.
$AV_{h,r}$	Availability of renewable energy source $r$ in hour $h$ .
$CI_p$	Carbon intensity of conventional power plant technology $p$ , tCO <sub>2</sub> /MWh.
$\overline{CP}_{y,p}, \overline{CP}_{y,r}$	Available legacy capacity of power plant technology $p$ or $r$ in year $y$ , MW.
$D_{y,d,h}$	Hourly demand for electricity in hour $h$ in representative day $d$ of year $y$ , MWh.
$\mathcal{F}_y(\lambda_y^{\text{ETS}})$	Relation between CO <sub>2</sub> emissions from the energy-intensive industry and EUA prices, tCO <sub>2</sub> .
$IC_p^{\text{C}}, IC_p^{\text{R}}$	Investment cost of technology $p$ or $r$ , €/MW.
$LT_{y,y^*,p}^{\text{C}}, LT_{y,y^*,r}^{\text{R}}$	Availability in year $y$ of an investment in technology $p$ or $r$ in year $y^*$ .

$N^{\text{EOM}}, N^{\text{ETS}}$	Number of participants in the energy-only market and the ETS auctions.
$RT_y$	Renewable energy target in the power sector in year $y$ , MWh.
$\overline{S}_y$	Supply of emission allowances in year $y$ prior to the introduction of the MSR, tCO <sub>2</sub> .
$SV_{y,p}^{\text{C}}, SV_{y,r}^{\text{R}}$	Salvage value of an investment in technology $p$ or $r$ constructed in year $y$ .
$VC_p$	Variable operating cost of power plant technology $p$ , €/MW.
$W_d$	Weight of representative day $d$ .
$\overline{x_{y,m}^{\text{MSR}}}$	Maximum outflow from the MSR in month $m$ of year $y$ , tCO <sub>2</sub> .
$\overline{x_{y,m}^{\text{MSR}}}$	Inflow to the MSR in month $m$ of year $y$ , % of TNAC.
<i>Units</i>	
k€	Thousands of Euros.
B€	Billions of Euros.
MtCO <sub>2</sub>	Million tonnes of CO <sub>2</sub> .
GtCO <sub>2</sub>	Billion tonnes of CO <sub>2</sub> .

## 1. Introduction

The European Emission Trading System (EU ETS) is considered the flagship of EU climate policy. A binding, annually reducing carbon emission cap, enforced via a tradable EU emission allowance (EUA) system, has been put into place in order to provide a strong price signal for cost-effective greenhouse gas abatement in the European electric power sector, energy-intensive industry and the aviation sector. Because the EUA price had dropped to levels far below those needed to trigger long-term decarbonisation (Koch et al., 2014) (Fig. 1) due to a large surplus of allowances in the system (Table 1), the European institutions decided in 2015 to introduce a market stability reserve (MSR) by 2019 (European Union, 2015; Richstein et al., 2015). This MSR absorbs (part of) the excess EUAs in the market, currently unallocated EUAs and EUAs not auctioned in 2014-2016 (backloading) (Bel and Joseph, 2015; European Union, 2015). In 2018, the European Council decided to strengthen the ETS and MSR in three ways (European Union, 2018). First, from 2021 onward, the annual linear reduction factor (LRF) of the emissions cap increases from 1.74% to 2.2%.<sup>1</sup> Second, from 2019 till 2023, the intake rate of the MSR doubles from 12% to 24%. Third, from 2023 onward, the MSR can not contain more allowances than the total number of allowances auctioned during the previous year (European Union, 2018). In addition, the European Union recently adopted a binding renewable energy target of 32% of the final energy use by 2030 (European Parliament & Council, 2018).

In the first year after the decision to strengthen the EU ETS, the EUA price tripled to a level above 20 €/tCO<sub>2</sub> and has stayed there since then.<sup>2</sup> Looking at Figure 1, it seems that, after a long period of stagnant prices below 10 €/tCO<sub>2</sub>, the strengthened MSR and increased LRF convinced market parties of the future scarcity of EUAs in the EU ETS.

In this paper we analyze the effects of the strengthened ETS, with specific attention for the cancellation of EUAs and the interaction with 2030 RES targets. In particular, we formulate a detailed European-wide equilibrium model that endogenously accounts for the reaction of the electric power sector, with a specific focus on short-term fuel switching and long-term investment in electricity generation capacity. This allows assessing the effect of the tightening of the emission cap on the EUA price, the required subsidies to meet the 2030 RES targets and the average wholesale electricity price, as well as investments in different electricity generation technologies. Furthermore, this allows accurately capturing the cost of meeting the emissions cap today and in the future, which affect the amount of EUAs cancelled by the MSR, thus the effective emissions cap. Indeed, the expectation of high abatement costs in the future provides an incentive for banking of EUAs, hence, increases the surplus today, the volume of allowances absorbed and cancelled by the MSR. The impact of this feedback effect depends on the relative difference between abatement costs today and in the future (Bruninx et al., 2019). In doing so, we bring together three strands of the literature.

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<sup>1</sup>Although this increase in LRF was already proposed in 2015 (European Union, 2015), it was not included in the adopted legislative package describing the first design of the MSR.

<sup>2</sup>Note that the EU Reference Scenario 2016 only expected this EUA price around the mid 2020s (Capros et al., 2016).

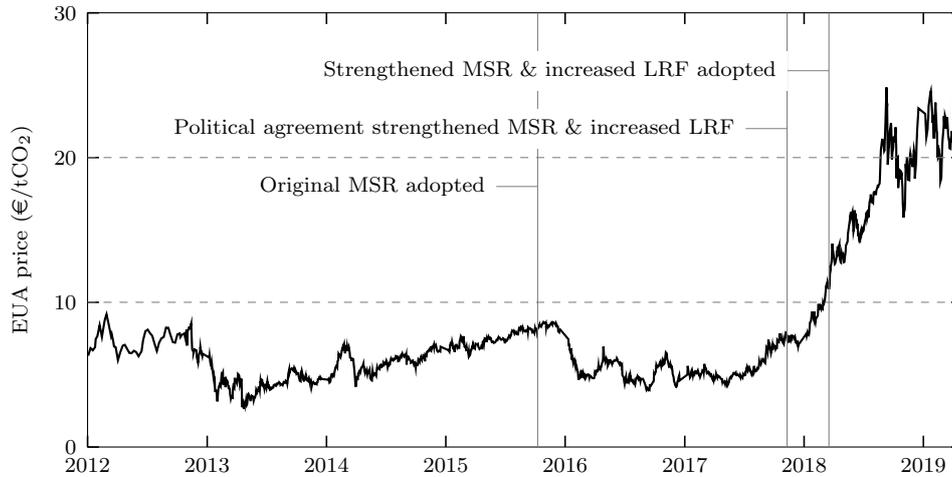


Figure 1. The EUA price during phase 3 of the EU ETS (EEX, Last accessed: August 1, 2019). Between 2012 and early 2018, the EUA price did not exceed 10 €/tCO<sub>2</sub>, despite the adoption of the first design of the MSR in 2015. After the decision to commit to a strengthened MSR and increased LRF, EUA prices steadily increased, with peaks above 25 €/tCO<sub>2</sub>.

39 The first strand of literature deals with the effect of EUA prices on CO<sub>2</sub> emissions in the  
40 electricity sector. Several recent papers have simulated fuel switching decisions in response to  
41 carbon prices and their interaction with renewable policies (Delarue and D’haeseleer, 2008;  
42 Delarue and Van den Bergh, 2016; Pettersson et al., 2012; Weigt et al., 2013; Cullen and  
43 Mansur, 2017). These papers estimate that a switch from coal and oil to natural gas in the  
44 electric power sector lowers CO<sub>2</sub> emissions by 2% (Pettersson et al., 2012) to 19% (Delarue  
45 and D’haeseleer, 2008; Weigt et al., 2013), depending on the EUA price and the studied  
46 period. This literature has, however, exclusively focused on the short-term operational  
47 effect of EUA prices, through merit-order switching of electricity generation technologies  
48 based on natural gas, oil and coal. Similar research focuses on the interaction between the  
49 subsidized deployment of renewables in the power sector and the EU ETS (De Jonghe et al.,  
50 2009; Van den Bergh et al., 2013; Delarue and Van den Bergh, 2016). For example, Van  
51 den Bergh et al. (2013) quantify the impact of RES deployment on the EUA price and  
52 CO<sub>2</sub> emissions in the Western and Southern European electricity sector during the period  
53 from 2007 to 2010, following from an operational partial equilibrium model of the electricity  
54 sector. This study shows that the CO<sub>2</sub> displacement from the electricity sector to other ETS  
55 sectors due to RES-E deployment can amount to more than 10% of historical CO<sub>2</sub> emissions  
56 in the electricity sector. We contribute to the understanding of the interaction between  
57 RES targets and the EU ETS, including the strengthened MSR, by explicitly considering  
58 different power sector-specific RES targets for 2030 (Section 5).

59 A second strand in the scientific literature is concerned with the effect of EUA prices on  
60 long-term investments in carbon abatement measures under the EU ETS. Perino and Willner  
61 (2016) study intertemporal optimization by cost-minimizing firms, based on the dynamic  
62 optimization framework of cap-and-trade systems with banking introduced by Rubin (1996).  
63 This insightful continuous analytical model allows presenting the equilibrium paths of CO<sub>2</sub>

64 emissions, EUA prices, EUA surplus and the MSR, but it makes the simplifying assumption  
65 that the aggregate marginal abatement cost function is linear. The paper’s quantitative  
66 results highly depend on the assumed functional form of the abatement cost function and  
67 the assumed parameter values. Our paper’s equilibrium model-based approach allows for  
68 a more detailed analysis of the abatement options and costs in the electricity sector and  
69 energy-intensive industry over time. To the best of the authors’ knowledge, our paper is the  
70 first one to study the effect of an ETS on long-term electricity generation investment using  
71 an equilibrium model, and, as a result, the first to assess the long-term qualitative effect of  
72 the strengthened MSR and increased LRF.<sup>3</sup>

73 Our long-term investment model assumes that individual risk-neutral agents make rational  
74 forward-looking decisions, based on their expectation of current and future EUA,  
75 renewable energy certificate (REC, see further) and energy prices. The equilibrium model  
76 allows obtaining the same equilibrium paths of emissions, prices and EUA surplus as those in  
77 continuous analytical models, but with the additional advantage that we model the long-term  
78 abatement cost function of the electricity sector (via dedicated investment models, electricity  
79 markets and RES targets) and the energy-intensive industry (via accurate, time-dependent  
80 abatement cost curves (Landis, 2015)) in detail, instead of making strong assumptions on  
81 its functional form. As outlined above and exposed in more detail by Bruninx et al. (2019),  
82 accurately capturing the costs of meeting the emissions cap today and in the future is critical  
83 in quantitative assessments of the impact of the MSR. We populate the model with parameters  
84 based on detailed data of the European electricity market. As the EUA price obviously  
85 fluctuates in response to changing commodity prices (Cullen and Mansur, 2017), macroeconomic  
86 evolutions (Bel and Joseph, 2015; Chevallier, 2009), technological developments and  
87 policy decisions (Van den Bergh et al., 2013; Delarue and Van den Bergh, 2016), we make  
88 assumptions about future operating costs (BP, 2017; ENTSO-E, 2018a), investment costs  
89 (International Energy Agency (IEA), 2015) and demand growth (European Commission,  
90 2016). As EUAs can be banked indefinitely, we consider a 45 year period to study the impact  
91 of strengthening the ETS. In order to model the discrete if-then decisions of the MSR,  
92 we solve our equilibrium model using an ADMM-inspired (Alternating Direction Method of  
93 Multipliers) algorithm (Höschle et al., 2018; Boyd et al., 2011), which allows separating the  
94 agents’ decision problems, determining the different market prices and the actions of the  
95 MSR (Section 3).

96 Leveraging the aforementioned model, our paper also adds to a third strand of literature  
97 that assesses the effect of an MSR in the EU ETS. Perino and Willner (2017) use the  
98 analytical model of Perino and Willner (2016) to assess the different proposals of the MSR,  
99 while Hepburn et al. (2016) discuss different options for reforming the MSR. Perino (2018)  
100 is the first to analyze the ultimately adopted strengthened MSR with cancellation. In  
101 this paper, we deliberately look beyond the short-term impact of the EU’s MSR policy

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<sup>3</sup>There exist a number of papers that endogenously deal with generation capacity investments under a carbon market with banking (Chappin et al., 2017; Richstein, 2015), but they leverage an agent-based electricity market simulation model instead of an equilibrium model and do not study the strengthened MSR. The results of such agent-based models are dependent on the assumptions on the rules governing the agents’ decision problems, which complicates isolating the impact of the MSR.

102 intervention, but we are also able to assess its effect in every year of the considered horizon.  
103 The analysis of this paper will show that the combination of the increased LRF and the  
104 strengthened MSR may indeed explain the observed abrupt change in EUA prices (Fig.  
105 1). Assuming rational dynamic cost-minimizing firms, we observe a 303% increase in EUA  
106 prices under our reference assumptions: i.e., in 2019, prices increase from 6.8 €/tCO<sub>2</sub> under  
107 the policies before 2018 (initial MSR design, 1.74% LRF) to 27.4 €/tCO<sub>2</sub> under the current  
108 policies. Under a set of reference assumptions, cumulative CO<sub>2</sub> emissions are 30.8 GtCO<sub>2</sub>,  
109 hence 41% or 21.3 GtCO<sub>2</sub> below the cumulative cap before the strengthening (52.2 GtCO<sub>2</sub>).  
110 Around 40% of this decrease (8.3 GtCO<sub>2</sub>) is due to the increased linear reduction factor and  
111 60% due to the cancellation policy (13 GtCO<sub>2</sub>, which amounts to 29.7% of the cumulative  
112 cap assuming a LRF of 2.2% post 2020). We estimate that a total of 5.6 to 17.8 GtCO<sub>2</sub> of  
113 EUAs are taken out of the EU ETS in the period 2017-2061 via the cancellation provision of  
114 the MSR, depending on our assumptions on the availability and costs of certain technologies,  
115 demand growth and discount rates (Section 5.2). This wide range in possible cancellation  
116 volumes may be explained via the feedback effect discussed above (Bruninx et al., 2019).  
117 Indeed, the availability and costs of certain technologies, demand growth and discount rates  
118 affects the relative cost of meeting the emissions cap in the future, hence, has an influence on  
119 the profitability of banking allowances. This in turn affects the surplus today, the amount  
120 of allowances absorbed and cancelled by the MSR, and finally, the cumulative emissions.  
121 Note that in all these cases, the increased LRF leads to a 8.3 GtCO<sub>2</sub> emission reduction, in  
122 addition to the cancellation volumes mentioned above.

123 As a comparison, Perino and Willner (2017) estimate cancellation volumes at 1.7 GtCO<sub>2</sub>,  
124 with TNAC (Total Number of Allowances in Circulation, a metric for the cumulative surplus  
125 between supply and demand for allowances, see Eq. (1) for a formal definition) levels below  
126 the 833 MtCO<sub>2</sub> threshold as of 2023, using a constant quadratic abatement cost curve from  
127 Landis (2015). Other authors report TNAC levels below 833 MtCO<sub>2</sub> at the latest by 2034  
128 (Perino et al., 2019; Quemin and Trotignon, 2018; Beck and Kruse-Andersen, 2018). When  
129 we use the same quadratic abatement cost curve in our model to represent both the energy-  
130 intensive industry and the power sector, we find a similar cancellation volume of 2.7 GtCO<sub>2</sub>.  
131 Similarly, when we use a constant quadratic abatement cost curve of the same form as  
132 Perino and Willner (2017) and calibrate its parameter to reach the same EUA price in 2019  
133 (27.4 €/tCO<sub>2</sub>), we still observe a cancellation volume below 3 GtCO<sub>2</sub>. The discrepancy  
134 with our central estimate (13 GtCO<sub>2</sub>) is explained by the fact that the constant quadratic  
135 abatement cost curve fails to capture the relation between CO<sub>2</sub> emissions and EUA prices  
136 at high abatement levels (Landis, 2015). Indeed, when we use the quartic polynomial of the  
137 exponential abatement (Eq. (4) in Landis (2015)) to describe the marginal abatement cost  
138 curves for both ETS-compliant sectors in our model, we find a cancellation volume of 10.9  
139 GtCO<sub>2</sub>, close to our central estimate of 13 GtCO<sub>2</sub>. By modeling the electricity sector in much  
140 detail, we find that the actual abatement cost curve is (i) more erratic and discontinuous and  
141 (ii) strongly increasing at high abatement levels, which can not be captured via quadratic  
142 abatement cost curves. As a consequence, we observe higher cancellation volumes, TNAC  
143 levels that remain longer above 833 MtCO<sub>2</sub> and higher EUA prices. These results stress the  
144 importance of the feedback effect (Bruninx et al., 2019), which impact is more pronounced as

145 the relative difference between abatement costs today and in the future grows. Low-degree  
146 polynomials, such as the quadratic abatement cost curve employed by Perino and Willner  
147 (2017), fail to capture the increase in abatement costs at high abatement levels, hence, will  
148 lead to underestimations of the feedback effect and the cancellation volumes.

149 In summary, the added value of this paper is twofold. First, we put forward a mixed  
150 complementarity problem (MCP), capturing the equilibrium between electricity generation  
151 companies and the energy-intensive industry in energy, REC and EUA markets, considering  
152 the strengthened MSR and recently adopted RES-targets in 2030. Second, we provide an  
153 analysis of the long-term effect of the strengthened MSR, with a specific focus on the changes  
154 in the power sector. Results include, i.a., the investments in the power sector, the impact on  
155 electricity, REC and ETS prices, equilibrium emission trajectories and cancellation volumes.  
156 In a sensitivity analysis in Section 5, we illustrate that the effect of the strengthened MSR and  
157 increased LRF on, i.a., the cumulative, effective emissions cap and EUA prices is dependent  
158 on, i.a., the evolution of the costs of abatement options and other climate and energy policies,  
159 such as renewable energy targets and nuclear phase-out policies. Furthermore, we define a  
160 number of alternative policy scenarios, which allow identifying the relative importance of  
161 the different policy changes adopted in 2018 (i.e., the 2.2% LRF, the cancellation provision,  
162 the doubling of the intake and outflow rates) and RES targets for the power sector.

163 The remainder of this paper is structured as follows. Section 2 dissects the working prin-  
164 ciples of the MSR and the EU ETS. Second, the methodology, mathematical formulation of  
165 the model and the ADMM algorithm are introduced in Section 3. The data and assumptions  
166 required for the numerical simulations are presented in Section 4. The results, both for our  
167 reference case and the sensitivity analyses, are discussed in Section 5. Before moving to  
168 concluding remarks (Section 7), we discuss the policy implications of our work in Section 6.

## 169 **2. The European Emission Trading System and the Market Stability Reserve**

170 To elevate EUA prices to meaningful levels, in 2015, the Council and the European  
171 Parliament took the decision to establish a Market Stability Reserve (MSR) (European  
172 Union, 2015). As outlined above, this legislative package was amended in 2018 (European  
173 Union, 2018), (i) strengthening the MSR via temporarily increased intake and outflow rates  
174 and the cancellation of allowances post 2023 and (ii) increasing the linear reduction factor  
175 as of 2021. The new rules governing the EU ETS are summarized in Table 2. In the period  
176 2013-2020, the cap on emissions is reduced by a linear reduction factor equal to 1.74% of  
177 the 2010 cap (Table 2). This means that in 2021, greenhouse gas emissions from the covered  
178 sectors will be 21% lower than in 2005. As of 2021, the cap on emissions will annually be  
179 reduced by a linear reduction factor equal to 2.2% of the 2010 cap (Table 2), such that CO<sub>2</sub>  
180 emissions will be 43% lower in 2030 than in 2005 (European Union, 2018).

Starting in 2019 and as long as the total number of allowances in circulation (TNAC)  
is above 833 MtCO<sub>2</sub>, the MSR will absorb part of the EUAs in circulation. The TNAC,  
which is a measure for the surplus of EUAs in the system, at the end of year  $y$  is defined as

(European Union, 2015; European Commission, 2017):

$$\text{TNAC}_y = \sum_{y^*=2008}^y (\text{Supply}_{y^*} - (\text{Demand and voluntary cancellation})_{y^*}) - \text{Allowances in the MSR}_y \quad (1)$$

181 According to European Commission (2018), the TNAC was 1,655 MtCO<sub>2</sub> at the end of  
182 2018. Table 1 shows that this surplus has decreased by 39 MtCO<sub>2</sub> from 2016 to 2017 and has  
183 stayed constant from 2017 to 2018. Note furthermore that the supply of allowances in 2018  
184 was below the emissions cap lowering the surplus.<sup>4</sup> This table also gives a more detailed  
185 breakdown of the supply and demand of allowances from 2008 till 2018.

186 The exact number of allowances absorbed by the MSR in each year depends on the  
187 TNAC in previous years: as long as the TNAC is above 833 MtCO<sub>2</sub>, 8% of it is transferred  
188 to the MSR in the next year and 16% in two years (Table 2). As of 2024, these percentages  
189 are halved to 4% and 8%. Following Table 1, this means that in 2019,  $0.16 \cdot 1,655$  million +  
190  $0.08 \cdot 1,655$  million = 397 million allowances will be absorbed by the MSR. This mechanism  
191 will effectively decrease the TNAC. Once the TNAC in the previous years drops below 400  
192 MtCO<sub>2</sub>, the MSR will release 200 MtCO<sub>2</sub> (prior to 2024) or 100 MtCO<sub>2</sub> (as of 2024) to the  
193 market (Table 2). If the MSR does not contain 200 MtCO<sub>2</sub> (before 2024) or 100 MtCO<sub>2</sub> of  
194 EUAs, all EUAs in the MSR are released.

195 From 2023, the MSR can not contain more allowances than the total number of allowances  
196 auctioned during the previous year<sup>5,6</sup>. This includes allowances which are to be auctioned  
197 at a later point in time because of their placement in the MSR.<sup>7</sup>

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<sup>4</sup>The difference between the annual emissions cap (i.e., the predetermined ceiling on emissions, based on the negotiated cap for the year 2013 and annually decreasing with the linear reduction factor) and the effective annual supply of allowances (i.e., the sum of allocated and auctioned allowances in a given year) may persist for a number of reasons. First, not all free allocations are handed to industry, because some facilities have either gone out of business or have cut their production sufficiently as such that they fall below a threshold and are not entitled to their intended allocation (partial cessation). Second, not all the Article 10C allocations have been handed out. These are the allowances that are freely allocated for modernization of the power sector in a number of European countries. Third, new entrance reserve (NER) allowances were monetized in front-loading selling in 2012-2013, so are not spread evenly throughout Phase 3 (2013-2020). Also, not all NER allowances have been allocated, due to a lack of new entrants, and therefore some will go unused at the end of Phase 3. Fourth, the auction volumes are not necessary tied to the exact dates. Last, the MSR may reduce or increase the supply of allowances w.r.t. the cap in a given year.

<sup>5</sup>“Unless otherwise decided in the first review carried out in accordance with Article 3, from 2023 allowances held in the reserve above the total number of allowances auctioned during the previous year shall no longer be valid.” (European Union, 2018).

<sup>6</sup>“From 2021 onwards, and without prejudice to a possible reduction pursuant to Article 10a(5a), the share of allowances to be auctioned shall be 57 %.” (European Union, 2018).

<sup>7</sup>“The number of auctioned allowances is made up of allowances auctioned on behalf of Member States, including allowances set aside for new entrants but not allocated, allowances for modernizing electricity generation in some Member States and allowances which are to be auctioned at a later point in time because of their placement in the market stability reserve established by Decision (EU) 2015/1814 of the European Parliament and of the Council.” (European Union, 2018).

198 In addition to the gradual absorption of EUAs, another 900 million back-loaded and an  
 199 estimated 700 million unallocated allowances will be absorbed by the MSR in 2019 and 2021  
 200 (European Union, 2015) (Table 2). Note that these allowances must also be accounted for in  
 201 the *supply* of allowances in the calculation of the TNAC (Table 1), although it is currently  
 202 unclear if and how the European Commission intends to do so.<sup>8</sup> If not properly accounted  
 203 for, placing these allowances in the MSR would trigger a significant decrease of the TNAC at  
 204 the end of 2019 and 2020 (see Eq. (1)). Indeed, the backloaded and unallocated allowances  
 205 combined amount to 1,600 MtCO<sub>2</sub>, which is close to the TNAC of 1,655 MtCO<sub>2</sub> at the  
 206 end of 2018. Consequently, the TNAC would be reduced to values well below 833 MtCO<sub>2</sub>,  
 207 hence, lead to lower or zero intake rates in the period 2021-2024 and, consequently, lower  
 208 cancellation volumes.

209 An aspect of the cancellation of allowances that has sparked some debate is its impact on  
 210 the ‘waterbed effect’ (i.e., individual changes in CO<sub>2</sub> emissions have no aggregate effect, as  
 211 the cap is fixed (Perino, 2018)). As a change of the TNAC affects the number of allowances  
 212 absorbed and canceled, the waterbed is said to be temporarily punctured (Perino, 2018).  
 213 As a result, abatement and emissions by market participants have an effect on the number  
 214 of allowances canceled. However, because of the gradual absorption of EUAs by the MSR,  
 215 an increase of the TNAC (e.g., because of decreased electricity consumption, decreased  
 216 economic activity or increased abatement) does not lead to a one-to-one increase of the  
 217 holdings of the MSR.<sup>10</sup> Only the following share will be absorbed and cancelled by the  
 218 MSR (Perino, 2018):

$$1 - (1 - 0.24)^n \cdot (1 - 0.12)^m \quad (2)$$

219 where  $n$  and  $m$  are the number of years between the time of increasing the TNAC by a single  
 220 allowance and the year the MSR stops absorbing EUAs (i.e., when the TNAC falls below

---

<sup>8</sup> “The Commission shall publish the total number of allowances in circulation each year, by 15 May of the subsequent year. The total number of allowances in circulation in a given year shall be the cumulative number of allowances issued in the period since 1 January 2008, including the number issued pursuant to Article 13(2) of Directive 2003/87/EC in that period and entitlements to use international credits exercised by installations under the EU ETS in respect of emissions up to 31 December of that given year, minus the cumulative tonnes of verified emissions from installations under the EU ETS between 1 January 2008 and 31 December of that same given year, any allowances cancelled in accordance with Article 12(4) of Directive 2003/87/EC and the number of allowances in the reserve. No account shall be taken of emissions during the three-year period starting in 2005 and ending in 2007 and allowances issued in respect of those emissions.” (European Union, 2015).

<sup>9</sup>New Entrants Reserve, which contains the revenues of 300 million EUAs, to be used for subsidizing installations of innovative renewable energy technology and carbon capture and storage (CCS) (European Commission, 2017).

<sup>10</sup>Note that aviation is currently excluded from the calculation of the TNAC. Increased emissions from the aviation sector has therefore no effect on the number of allowances placed in the MSR and, consequently, being canceled, but it will effectively decrease the surplus of allowances. Between 2012 and 2018, the inclusion of intra-European flights in the EU ETS has delivered an additional reduction of 100 million allowances, because only around 38 million allowances has been issued yearly, while verified CO<sub>2</sub> emissions from aviation activities carried out between airports in the EEA have increased from 53.5 MtCO<sub>2</sub> in 2013 to 64.2 MtCO<sub>2</sub> in 2017. As a result, the European Commission will at some point in the future have to address the gap between the defined TNAC (see Eq. (1)) and the actual surplus of allowances.

Table 1. Supply and demand of EU ETS allowances as of 2013 in MtCO<sub>2</sub> (European Commission, 2017, 2018, 2019). A significant part of the surplus resulted from the banking of allowances from the 2008-2012 period, during which, i.a., the 2008-2009 economic downturn depressed emissions, creating an excess of EAUs. The difference between the cap and effective supply of EUAs, referred to as unallocated allowances, will be placed in the MSR after the third phase of the EU ETS (see below). Note furthermore that the supply of allowances in 2018 (1,690 MtCO<sub>2</sub>) is below the emissions cap (1,892 MtCO<sub>2</sub>) (excluding aviation).

	2016	2017	2018	2017-2016	2018-2017
<b>Supply</b>					
(a) Banking from 2008-2012	1,750	1,750	1,750	0	0
(b) Allowances allocated for free	3,601	4,403	5,162	802	759
(c) Allowances auctioned	2,774	3,726	4,641	951	915
(d) NER300 programme <sup>9</sup>	300	300	300	0	0
(e) International credit entitlements	409	419	434	10	15
Sum supply	8,833	10,597	12,287	1,764	1,690
<b>Demand</b>					
(a) Verified emissions	7,139	8,942	10,632	1,803	1,690
(b) Allowances canceled	0.19	0.28	0.32	0.09	0.04
(c) Allowances in the MSR	0	0	0	0	0
Sum demand	7,140	8,943	10,632	1,803	1,690
<b>Surplus of allowances (TNAC)</b>	1,694	1,655	1,655	-39	0

221 the 833 MtCO<sub>2</sub> threshold), with intake rates of 24% and 12% (Perino, 2018). For example,  
 222 if the TNAC falls below the threshold in 2023, a 1 tCO<sub>2</sub> abatement in 2019 will decrease  
 223 cumulative emissions by 0.67 tCO<sub>2</sub> ( $= 1 - (1 - 0.24)^4$ ), while a 1 tCO<sub>2</sub> abatement in 2022  
 224 will decrease the cumulative emissions by only 0.24 tCO<sub>2</sub> ( $= 1 - (1 - 0.24)^1$ ).

225 This temporary puncture of the waterbed increases the relevance of complementary cli-  
 226 mate policies – such as targets for renewable energy production or energy efficiency and  
 227 unilateral policies (Perino et al., 2019) – as they affect the TNAC, hence, the actions of the  
 228 MSR. In this regard, it is worth mentioning the recently adopted 2030 RES target of 32%  
 229 of the final energy use (European Parliament & Council, 2018).<sup>11</sup> To facilitate cost-effective  
 230 compliance with these targets, the European Commission foresees extensive collaborative  
 231 efforts between member states, e.g., via statistical transfers, joint projects and joint support  
 232 schemes. As targets per country and per sector are currently undecided, we will assume a  
 233 uniform 32% target across sectors in our reference scenario and perform sensitivity analyses  
 234 on this target. Note, however, that (i) the current national renewable energy actions plans  
 235 of the Member States envision a renewable energy share of 34% in the power sector in 2020  
 236 (Elia, 2017) and (ii) the European Commission does not allow Member States to decrease  
 237 their share of renewable energy w.r.t. their 2020 targets after 2020 (European Parliament

<sup>11</sup> “Member States shall collectively ensure that the share of energy from renewable sources in the Union’s gross final consumption of energy in 2030 is at least 32 %.” (European Parliament & Council, 2018).

238 & Council, 2009). Hence, depending on the demand growth and the target in 2030, the  
239 2020 or 2030 target may be binding. To ensure compliance with the most stringent target,  
240 we assume a European Renewable Certificate (REC) system, in line with the foreseen joint  
241 support schemes (European Parliament & Council, 2018). The resulting REC prices and  
242 associated out-of-market payments must be interpreted as minimum subsidy costs to meet  
243 the renewable energy target in the power sector. Because we do not model any national  
244 or regional subsidies for specific renewable technologies, the REC subsidies will incentivize  
245 investment in the renewable technology that generates electricity at the lowest cost per  
246 MWh. Additional subsidies for a specific renewable technology will change our estimated  
247 REC prices and generation share of the considered renewable technologies. However, if the  
248 renewable target in the power sector is binding, this will not affect the overall RES share.

249 In the next section, we introduce the equilibrium model used to study the interaction  
250 between the power sector and the energy-intensive industry in the energy-only electricity  
251 market, renewable energy targets and the ETS with the increased LRF and strengthened  
252 MSR. By modeling both dispatch and investment decisions under prevailing electricity, REC  
253 and EUA prices, this paper quantifies the total abatement in the electricity sector due to  
254 both short-term merit-order fuel switching and long-term investment in electricity generation  
255 technologies over time. This model allows calculating, i.a., equilibrium emission trajectories  
256 for the power sector and energy-intensive industry under the associated equilibrium EUA  
257 prices.

Table 2. Overview of the EU ETS and the parameters governing the MSR, based on Sandbag (2017a); European Commission (2017); European Union (2018). The supply of allowances in 2017 (1,764 MtCO<sub>2</sub>) is complemented with the estimated surplus in at the end of 2016 (1,693 MtCO<sub>2</sub>) (European Commission, 2017; Sandbag, 2017a). Note that the supply of allowances in 2017 is set to the supply reported by the EC and is lower than the emissions cap (Table 1) (European Commission, 2017, 2018). As of 2018, we assume the supply of allowances is equal to the cap. The linear reduction factor (LRF) describes the annual reduction of the supply of allowances. The intake rate of the MSR depends on the total allowances in circulation (TNAC) in the preceding two years. The output rate of the MSR is fixed to 200 MtCO<sub>2</sub> (2019-2023) or 100 MtCO<sub>2</sub> (from 2024 onwards). The conditions for non-zero inflows to or outflows from the MSR are summarized in Algorithm 2 (Appendix A). In 2019, 900 MtCO<sub>2</sub> of back-loaded allowances will be added to the MSR (European Union, 2018). Similarly, not-allocated allowances from Phase 3, estimated to amount to 700 MtCO<sub>2</sub> (Sandbag, 2017a) are placed in the MSR in 2021 (see also Table 1 and Section 2). As of 2023, the MSR may only contain as much allowances as the auctioned volume in the preceding year (57% of the cap  $\bar{S}_y$ ) (European Union, 2018). The excess allowances are cancelled.

Year	Supply (MtCO <sub>2</sub> )	LRF	Market Stability Reserve		
			Intake rate $if TNAC_{20xx,12} > 833$ (MtCO <sub>2</sub> )	Output rate $if TNAC_{20xx,12} < 400$ (MtCO <sub>2</sub> )	Limit (MtCO <sub>2</sub> )
2017	1,764 + 1,694	38.26	0	0	0
2018	1,893	38.26	0	0	0
2019	1,855	38.26	$0.16 \cdot TNAC_{2017,12} + 0.08 \cdot TNAC_{2018,12} + 900$	200	0
2020	1,816	38.26	$0.16 \cdot TNAC_{2018,12} + 0.08 \cdot TNAC_{2019,12}$	200	0
2021	1,728	48.38	$0.16 \cdot TNAC_{2019,12} + 0.08 \cdot TNAC_{2020,12} + 700$	200	0
2022	1,679	48.38	$0.16 \cdot TNAC_{2020,12} + 0.08 \cdot TNAC_{2021,12}$	200	0
2023	1,631	48.38	$0.16 \cdot TNAC_{2021,12} + 0.08 \cdot TNAC_{2022,12}$	200	$0.57 \cdot \bar{S}_{y-1}$
2024-2061		48.38	$0.08 \cdot TNAC_{20xx-2,12} + 0.04 \cdot TNAC_{20xx-1,12}$	100	$0.57 \cdot \bar{S}_{y-1}$

### 259 3. Methodology

260 The equilibrium between CO<sub>2</sub> abatement actions in industry, investment and operational  
261 decisions in the electric power sector, the wholesale electricity market, RES targets and the  
262 EU ETS is formulated as a large-scale Mixed Complementarity Problem (MCP). The energy-  
263 intensive industry minimizes the cost of procuring EUAs to offset their CO<sub>2</sub> emissions.  
264 The annual CO<sub>2</sub> emissions of the energy-intensive industry are determined endogenously  
265 as a function of the EUA price. Conventional electricity generation companies invest in  
266 new power plants if their expected profit in the wholesale market covers their investment  
267 and operating costs, including their expenses for EUAs under the EU ETS. Renewable  
268 electricity generation companies receive RECs, in addition to revenues from the energy-  
269 only electricity market, to ensure compliance with the 2020 and 2030 RES targets. As we  
270 assume no barriers to investment (free entry) and a perfectly competitive wholesale market,  
271 investment will occur until expected profits associated with new generation capacity are zero.  
272 The wholesale electricity market, a REC system and the EU ETS are enforced as coupling  
273 constraints in the large-scale MCP. The demand for electricity is imposed exogenously on  
274 the electricity market clearing. The EU ETS system is characterized by an annual amount  
275 of EUAs released, the current excess and the MSR. The MCP is solved using ADMM,  
276 inspired by Höschle et al. (2018). In what follows, we subsequently introduce the agents,  
277 their interactions and a non-exhaustive list of assumptions (Section 3.1). Second, we provide  
278 the mathematical formation of the optimization problem solved by each of the agents and  
279 the coupling constraints (Section 3.2). Before moving to the simulation results, the solution  
280 strategy is introduced.

#### 281 3.1. Description of the Mixed Complementarity Problem

##### 282 3.1.1. Agents, objectives & coupling constraints

283 The power sector is represented by a set of agents, each responsible for the operation of  
284 and investment in a specific renewable or conventional generation technology. The energy-  
285 intensive industry is represented through the relation between CO<sub>2</sub> emissions and EUA  
286 prices obtained from a general equilibrium model by Landis (2015). The CO<sub>2</sub> emissions of  
287 the energy-intensive industry are capped to the reported 2017 emissions (Sandbag, 2017a).  
288 The demand for goods and services produced by the energy-intensive industry is not con-  
289 sidered explicitly. The relationship between CO<sub>2</sub>-emissions and EUA prices proposed by  
290 Landis (2015) should, however, be interpreted as a the marginal abatement cost function  
291 of an energy-intensive sector where both industries and consumers may respond to higher  
292 allowance prices by adopting energy efficiency measures and decreasing the consumption  
293 of more polluting and, thus, expensive goods and services. Generating companies offer  
294 their capacity at long-run marginal generation cost, i.e., including capacity costs for to-be-  
295 built installations, in the energy-only market (no strategic behavior) and compete with the  
296 energy-intensive industry for EUAs on the EU ETS auctions. We enforce the compliance  
297 with the RES target by imposing a REC system. The RECs must be considered as the  
298 minimal mark-up on top of the energy-only price that ensures the economic viability of in-  
299 vestments in RES-based generation required to meet the RES targets. Prices are obtained as

300 the Lagrangian multipliers of the coupling constraints enforcing the balance in each market,  
301 assuming an inelastic demand (energy-only market and REC system) or an inelastic supply  
302 (EU ETS, corrected for the actions of the MSR).

### 303 *3.1.2. Interactions*

304 All agents base their investment decisions solely on the electricity, REC and EUA price.  
305 None of their decision variables are communicated to other market participants. Generating  
306 companies provide the amount of electricity they are willing to generate at each time step to  
307 the energy-only market and submit a demand for EUAs to the ETS auction. Simultaneously,  
308 RES-based generation companies provide the annual output of their currently installed and  
309 to-be-build power plants to the REC market. The energy-intensive industry decides on the  
310 quantity of EUAs they need to procure in each year.

### 311 *3.1.3. Assumptions*

312 In order to isolate the impact of the policy measure, we assume that all agents act  
313 rational, price-taking and risk-neutral, which is common practice in long-term investment  
314 models (Poncelet et al., 2020; Hirth, 2013; Pfenninger et al., 2014). They have perfect  
315 foresight on EUA, REC and energy prices on perfectly competitive markets, allowing inter-  
316 temporal arbitrage, and do not perceive any barriers to entry, as in, i.a., Perino and Willner  
317 (2016, 2017) and Kollenberg and Taschini (2016).

318 In the electricity market clearing, the transmission system is not considered, nor are  
319 interconnections of the European power system to, e.g., Russia and Tunisia. For conven-  
320 tional, thermal electricity generation, only fuel costs are considered – other operating and  
321 maintenance costs are neglected. The dispatch schedules resulting from the energy-only  
322 electricity are assumed to be the actual generation schedules, hence the emissions may be  
323 directly obtained from the result of the market clearing. The electricity market is cleared  
324 with an hourly resolution, assuming an inelastic demand. The demand for electrical energy  
325 and the availability of renewable energy sources in each calendar year is represented via a set  
326 of four representative days, optimally selected from load, solar and wind power timeseries  
327 of calendar year 2017 (ENTSO-E, 2018b) via the method of Poncelet et al. (2017). Since  
328 the relation between abatement efforts in the energy-intensive industry and electrification  
329 is fundamentally uncertain (McKinsey & Company, 2018) and dependent on the elasticity  
330 of fuel substitution, we do not link electricity demand growth to emission reductions in the  
331 energy-intensive industry. Similarly, electrification in other sectors and the electricity de-  
332 mand from novel technologies is exogenously imposed on the model by considering a demand  
333 growth rate and perform a sensitivity analysis w.r.t. this parameter.

334 Dynamic power plant constraints, operating reserves, . . . are not considered in the model.  
335 As such, one may overestimate the contribution of, e.g., less flexible technologies, such as  
336 current coal- and lignite-fired units. However, this effect may be partially compensated  
337 by the fact that we do not consider, e.g., demand side flexibility or energy storage, which  
338 may absorb the variability and short-term uncertainty associated with RES-based electricity  
339 generation. Similarly, the single profile representation of RES availability and its limited

340 temporal resolution may lead to technology biases. However, we believe that this may result  
 341 in shifts between technologies, but does not significantly impacts CO<sub>2</sub> emissions.

342 The EUA auctions are executed annually, motivated by the yearly obligation of the  
 343 market participants to surrender EUAs to cover their emissions and the assumption of perfect  
 344 foresight across the model horizon. This allows perfect price arbitrage within the year,  
 345 given the bankable nature of EUAs, levelling out price differences. We assume generating  
 346 companies and the energy-intensive industry bank allowances themselves, i.e., we do not  
 347 consider financial institutes that would act as intermediaries.

348 Similarly, the price of REC is calculated annually. The REC are awarded on a per MWh  
 349 basis and spread-out from 2020 to the end of the model horizon, to ensure (i) the renewable  
 350 energy targets are met in 2020 and (ii) the share of renewable energy does not decrease  
 351 below the 2020 target after 2020. We assume a RES target in each year, starting from the  
 352 2020 RES target (34% of the electricity demand in 2020) (Elia, 2017) and linearly increasing  
 353 to the RES target in 2030 (in our reference policy scenario, 32% of the electricity demand  
 354 in 2030). If the 2020 RES target is more stringent than the 2030 target (e.g., due to low  
 355 demand growth), we enforce the 2020 target in absolute terms (i.e., in GWh) in 2030. Post  
 356 2030, the 2030 RES target is considered as a lower bound, i.e., the energy output from RES  
 357 in the power sector must remain at least equal to the 2030 RES target in absolute terms.  
 358 Only to-be-built capacity is eligible for REC, as we assume current RES-based capacity is  
 359 either paid-for or covered under other out-of-market support schemes. Note, however, that  
 360 the output of legacy RES capacity is accounted for in the calculation of the gap between  
 361 the annual RES output and the target in each year.

## 362 3.2. Mathematical model

### 363 3.2.1. Profit-maximizing conventional generating company $p$

364 The expected profit of each conventional generating company  $p$  (set  $\mathcal{P}$ ) is calculated as  
 365 the discounted sum of the difference between the energy-only market price  $\lambda_{y,d,h}^{\text{EOM}}$  and the  
 366 variable generation cost  $VC_p^C$  multiplied with the generated energy  $g_{y,d,h,p}^C$  at each time step  
 367  $h$  in a number of representative days  $d$ , weighted by  $W_d$ . This expected profit must cover  
 368 the investment costs  $IC_p^C \cdot cp_{y,p}^C$ , corrected for the salvage value  $SV_{y,p}^C$  of the investment at  
 369 the end of the model horizon, and the cost of procuring EUAs  $\lambda_y^{\text{ETS}} \cdot b_{y,p}^C$ , with  $\lambda_y^{\text{ETS}}$  the  
 370 price of an EUA. For each conventional generating company  $p \in \mathcal{P}$ , we solve the following  
 371 optimization problem:

$$\begin{aligned}
 & \text{Max.} \\
 & g_{y,h,p}^C, b_{y,p}^C, cp_{y,p}^C \quad \sum_{y \in \mathcal{Y}} A_y \cdot \left[ \sum_{d \in \mathcal{D}} W_d \cdot \sum_{h \in \mathcal{H}} (\lambda_{y,d,h}^{\text{EOM}} - VC_p^C) \cdot g_{y,d,h,p}^C - (1 - SV_{y,p}^C) \cdot IC_p^C \cdot cp_{y,p}^C - \lambda_y^{\text{ETS}} \cdot b_{y,p}^C \right] \quad (3)
 \end{aligned}$$

subject to

$$\forall y \in \mathcal{Y}, d \in \mathcal{D}, h \in \mathcal{H}, p \in \mathcal{P} : g_{y,d,h,p}^C \leq \sum_{y^*=1}^y LT_{y,y^*,p}^C \cdot cp_{y^*,p}^C + \overline{CP}_{y,p}^C \quad (4)$$

$$\forall y \in \mathcal{Y}, p \in \mathcal{P} : \sum_{y^*=1}^y \sum_{d \in \mathcal{D}} W_d \cdot \sum_{h \in \mathcal{H}} CI_p^C \cdot g_{y^*,d,h,p}^C \leq \sum_{y^*=1}^y b_{y^*,p}^C \quad (5)$$

$$\forall y \in \mathcal{Y}, d \in \mathcal{D}, h \in \mathcal{H}, p \in \mathcal{P} : g_{y,h,p}^C, b_{y,p}^C, cp_{y,p}^C \geq 0 \quad (6)$$

372 Constraint (4) limits the output of technology  $p$  to the to-be-installed capacity  $\sum_{y^*=1}^y LT_{y,y^*,p}^C$ .  
 373  $cp_{y^*,p}^C$ , accounting for its lifetime and the lead time on the investment through parameter  
 374  $LT_{y,y^*,p}^C$ , and the legacy capacity  $\overline{CP}_{y,p}^C$ . The annual CO<sub>2</sub> emissions associated with this tech-  
 375 nology are calculated based on its carbon intensity  $CI_p^C$  and should be offset by procured  
 376 EUAs  $b_{y,p}^C$  up to that year  $y$  (Eq. (5)).

### 3.2.2. Profit-maximizing renewable generating company $r$

377 Renewable generating companies invest in additional capacity  $cp_{y,r}^R$  of type  $r$  until ex-  
 378 pected profits, i.e., the difference between (i) profits from the energy-only market on a num-  
 379 ber of representative days  $\sum_{y \in \mathcal{Y}} \sum_{d \in \mathcal{D}} \sum_{h \in \mathcal{H}} A_y \cdot W_d \cdot \lambda_{y,d,h}^{\text{EOM}} \cdot g_{y,d,h,r}^R$  and REC  $\sum_{y \in \mathcal{Y}} A_y \cdot \lambda_y^{\text{REC}}$ .  
 380  $g_{y,r}^{\text{R,NB}}$ , with  $\lambda_y^{\text{REC}}$  the REC price, and (ii) the investment costs  $\sum_{y \in \mathcal{Y}} A_y \cdot (1 - SV_{y,r}^R) \cdot IC_r^R \cdot cp_{y,r}^R$ ,  
 381 are zero:  
 382

$$\text{Max.}_{g_{y,d,h,r}^R, g_{y,r}^{\text{R,NB}}, cp_{y,r}^R} \sum_{y \in \mathcal{Y}} A_y \cdot \left[ \sum_{d \in \mathcal{D}} W_d \cdot \sum_{h \in \mathcal{H}} \lambda_{y,d,h}^{\text{EOM}} \cdot g_{y,d,h,r}^R + \lambda_y^{\text{REC}} \cdot g_{y,r}^{\text{R,NB}} - (1 - SV_{y,r}^R) \cdot IC_r^R \cdot cp_{y,r}^R \right] \quad (7)$$

subject to

$$\forall y \in \mathcal{Y}, d \in \mathcal{D}, h \in \mathcal{H}, r \in \mathcal{R} : g_{y,d,h,r}^R \leq AV_{d,h,r} \cdot \left( \sum_{y^*=1}^y LT_{y,y^*,r}^R \cdot cp_{y^*,r}^R + \overline{CP}_{y,r} \right) \quad (8)$$

$$\forall y \in \mathcal{Y}, \forall r \in \mathcal{R} : g_{y,r}^{\text{R,NB}} \leq \sum_{d \in \mathcal{D}} W_d \cdot \sum_{h \in \mathcal{H}} AV_{d,h,r} \cdot \sum_{y^*=1}^y LT_{y,y^*,r}^R \cdot cp_{y^*,r}^R \quad (9)$$

$$\forall y \in \mathcal{Y}, d \in \mathcal{D}, h \in \mathcal{H}, r \in \mathcal{R} : g_{y,d,h,r}^R, g_{y,r}^{\text{R,NB}}, cp_{y,r}^R \geq 0 \quad (10)$$

383 Note that (i) variable generation costs are assumed to be zero; (ii) CO<sub>2</sub> emissions from RES-  
 384 based generation are not considered; (iii) the variable nature of some forms of renewable  
 385 generation is captured via the availability profile  $AV_{d,h,r}$  and (iv) REC are only awarded to  
 386 newly built capacity, based on their annual output  $g_{y,r}^{\text{R,NB}}$ .

### 3.2.3. Cost-minimizing industry

387 To represent the impact of the energy-intensive industry on the demand for EUAs, we  
 388 consider the relationships between the EUA price  $\lambda_y^{\text{ETS}}$  and emissions  $e_y^{\text{I}}$  obtained by Landis  
 389

390 (2015), here summarized as  $e_y^I = \mathcal{F}_y(\lambda_y^{ETS})$ . The energy-intensive industry minimizes the  
 391 procurement cost of the required EUAs  $b_y^I$  to cover their emissions  $e_y^I$ :

$$\text{Min.}_{e_y^I, b_y^I} \sum_{y \in \mathcal{Y}} A_y \cdot \lambda_y^{ETS} \cdot b_y^I \quad (11)$$

subject to

$$\forall y \in \mathcal{Y} : \sum_{y^*=1}^y b_{y^*}^I \geq \sum_{y^*=1}^y e_{y^*}^I \quad (12)$$

$$\forall y \in \mathcal{Y} : e_y^I = \mathcal{F}_y(\lambda_y^{ETS}) \quad (13)$$

$$\forall y \in \mathcal{Y} : b_y^I \geq 0 \quad (14)$$

392 Constraint (12) ensures that the energy-intensive industry procures sufficient allowances  
 393  $b_y^I$  to offset its CO<sub>2</sub> emissions  $e_y^I$ , calculated via the relation between allowance prices and  
 394 emissions  $\mathcal{F}_y(\lambda_y^{ETS})$  (Eq. (13)).

#### 395 3.2.4. Energy-only market, REC and ETS auctions as coupling constraints

The decision problems of the agents above are linked through three coupling constraints, representing the equilibrium in the energy-only market (EOM) for electricity, the ETS and REC auctions:

$$\forall y \in \mathcal{Y}, d \in \mathcal{D}, h \in \mathcal{H} : \sum_{p \in \mathcal{P}} g_{y,d,h,p}^C + \sum_{r \in \mathcal{R}} g_{y,d,h,r}^R - D_{y,d,h} \geq 0 \quad (\lambda_{y,d,h}^{EOM}) \quad (15)$$

$$\forall y \in \mathcal{Y} : S_y - \sum_{p \in \mathcal{P}} b_{y,p}^C - b_y^I \geq 0 \quad (\lambda_y^{ETS}) \quad (16)$$

$$\forall y \in \mathcal{Y} : \sum_{r \in \mathcal{R}} \sum_{d \in \mathcal{D}} W_d \sum_{h \in \mathcal{H}} g_{y,d,h,r}^R - RT_y \geq 0 \quad (\lambda_y^{REC}) \quad (17)$$

396 with  $D_{y,d,h}$  the demand for electricity in each hour  $h$  of representative day  $d$  in year  $y$ ,  $S_y$   
 397 the supply of allowances and  $RT_y$  the renewable energy target in the power sector.

398 The dual variables associated with these constraints are indicated between parentheses  
 399 and may be interpreted as the prices in the EOM, ETS and REC auctions that ensure  
 400 that each agent's strategy coincides with its long-run equilibrium strategy. In other words,  
 401 presented with these prices, no agent has an incentive to change its strategy. Note that the  
 402 supply of allowances  $S_y$  is the net supply of EUAs, corrected for the actions of the MSR.  
 403 The MSR actions are imposed on the price update steps of the ADMM algorithm, which  
 404 enforces the coupling constraints (Eq. (15)-(17)), as discussed below.

#### 405 3.3. Solving the MCP using ADMM

406 In order to calculate the equilibrium between conventional generating companies, renew-  
 407 able generating companies and the energy-intensive industry defined by Eq. (3)-(17), we  
 408 leverage an ADMM-based algorithm inspired by Höschle et al. (2017); Höschle (2018). In

409 essence, this algorithm facilitates an iterative search for the prices that equate supply and  
 410 demand in each of the three markets and ensure that the strategies of all agents coincide  
 411 with their long-run equilibrium strategies. In what follows, we summarize the steps in the  
 412 iterative ADMM algorithm. For details on the implementation and the convergence of the  
 413 algorithm, the reader is referred to Appendix A and Höschle (2018).

The ADMM-based algorithm will try to find the equilibrium based on a price adjustment procedure (Höschle, 2018). In each iteration, each agent receives the price of EUAs, REC and electricity at each time step. Based on this information, each agent optimizes its investment decisions, according to optimization problems (3)-(6), (7)-(10) and (11)-(14)<sup>12</sup>. These decisions define the imbalances between demand and supply in all three markets in each iteration  $i$ , which in turn affect market prices through a predefined price update mechanism. For example, for EUAs, we define the following price update strategy, with  $\rho$  the price update step size:

$$\forall y \in \mathcal{Y} : \lambda_y^{\text{ETS},i+1} = \lambda_y^{\text{ETS},i} - \frac{\rho}{8760} (S_y^{i+1} - \sum_{p \in \mathcal{P}} b_{y,p}^{\text{C},i} - b_y^{\text{I},i}), \quad (18)$$

414  $S_y^{i+1}$  is the net supply of allowances, corrected for the MSR actions. The intake and output  
 415 of the MSR is governed by the total number of allowances in circulation (TNAC) in the  
 416 preceding years. The TNAC in each year is calculated based on (i) the gross supply of  
 417 allowances  $\bar{S}_y$ , including backloaded and unallocated allowances, and (ii) the CO<sub>2</sub> emissions,  
 418 cancellation and state of the MSR as calculated in iteration  $i$  (see Table 2 and Algorithm  
 419 2). Since the imbalances are calculated on an annual basis, we apply a scale factor of  
 420 8760 in the price updates to avoid overly aggressive price updates. Similarly, we update  
 421 the prices on the energy only market and the REC auctions in each iteration (Appendix  
 422 A). We update the available supply of allowances in each iteration of the ADMM algorithm  
 423 according to EU rules governing the MSR (Table 2 and Algorithm 2). By repeating this price  
 424 and MSR update process, we determine the equilibrium prices at which none of the agents  
 425 has an incentive to change its investment decisions and the market clearing conditions are  
 426 satisfied. If the supply of allowances, the state of the MSR, the prices and the decisions of  
 427 all agents no longer change from one iteration to the next, we assume this solution describes  
 428 an equilibrium.<sup>13</sup>

#### 429 4. Data & assumptions

430 We study the impact of a strengthened EU ETS on the European power system for the  
 431 period 2017-2061. We limit the geographical scope to the countries participating in the  
 432 EU ETS, but omit Iceland. In what follows, we describe our assumptions in the proposed

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<sup>12</sup>Penalty terms are added to the objectives of the agents based on the augmented Lagrangian. These penalty terms, which reduce to zero upon convergence of the algorithm, avoid excessive oscillatory behavior and overreactions to small price differences. For more details, the reader is referred to Appendix A.

<sup>13</sup>For details on the stopping criterion and convergence metrics, we refer the interested reader to Appendix A and Höschle (2018).

433 central reference scenario, designed to reflect current policies. The design and current state  
434 of the EU ETS system are based on European Commission (2017, 2018, 2015) and European  
435 Union (2018) (Table 2). In Section 5.2, we discuss which assumptions below are changed in  
436 our alternative policy scenarios and sensitivity analyses.

437 The currently installed power plant capacity is based on the most recent data available  
438 on the ENTSO-E transparency platform (ENTSO-E, 2018b), complemented with own cal-  
439 culations. The installed capacity of onshore wind, offshore wind and solar photovoltaics is  
440 updated based on WindEurope (2018a,b) and SolarEurope (2018). Must-run technologies  
441 (waste, geothermal, hydro, peat, other, marine, biomass - 215,994 MW in total according  
442 to ENTSO-E (2018b)) are treated as a demand correction. All capacity is aggregated per  
443 technology (Table 4). Decommissioning rates, which are assumed to be linear, for currently  
444 installed capacity are based on the lifetime of the technology and the estimated average  
445 age of the current installed capacity. The lifetime, operating cost and carbon intensity of  
446 each technology is based on data from the Ten Year Network Development Plan (ENTSO-  
447 E, 2018a). The average age of the current installed capacity is based on assumptions of  
448 the authors, as commissioning dates are typically not available. Investment costs of thermal  
449 generation capacity were taken from International Energy Agency (IEA) (2015). Investment  
450 costs for thermal technologies are assumed to remain constant in the period 2017-2061. On-  
451 shore wind power, offshore wind power and solar power investment costs are taken from  
452 International Energy Agency (IEA) (2015) and assumed to decrease annually by 2%. The  
453 operating costs of conventional technologies are based on the efficiency of the technology,  
454 taken from ENTSO-E (2018a), and historic fuel prices and fuel price projections (BP, 2017;  
455 ENTSO-E, 2018a). Unless stated otherwise, the nuclear, coal-fired and lignite-fired capacity  
456 may not exceed the aggregated capacity of each technology in 2017. In other words, only  
457 phased-out capacity may be replaced by new investments. The nominal discount rate is set  
458 to 10%.

459 Time series for the load, generation from renewable energy sources and must-run tech-  
460 nologies for calendar year 2017 are obtained from ENTSO-E (2018b). The net load profile,  
461 i.e., the load corrected for must-run generation, and profiles characterizing the availability  
462 of onshore wind, offshore wind and solar power are reduced to four representative days,  
463 optimally selected throughout the calendar year via the method introduced by Poncelet  
464 et al. (2017). The demand growth is based on the EU Reference Scenario 2016 (Fig. 15 in  
465 European Commission (2016)): +0.1% in 2010-2020, +0.45% in 2020-2030 and +0.71% in  
466 2030-2061. This growth rate reflects the aggregate effect of electrification, adoption of new  
467 technologies and energy efficiency measures across all sectors.

468 The 2020 RES target (34% of the electricity demand in 2020) is enforced as of 2020, since  
469 it is more stringent than the 2030 target (32% of the electricity demand in 2020) considering  
470 the demand growth rates above (Section 3.1.3). The contribution of renewable must-run  
471 technologies, such as hydro and biomass, is estimated at 16.5% in 2018 and subtracted from  
472 the RES target in absolute terms.<sup>14</sup> The output of RES-based and other must-run technolo-

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<sup>14</sup>According to the latest EUROSTAT data, retrieved from <https://ec.europa.eu/eurostat/web/energy/data/shares>.

Table 3. Average operating costs, efficiency and carbon intensity, based on the Ten Year Network Development Plan by ENTSO-E (2018a) and 2017 fuel prices as reported by BP (2017). Operating costs for all other years are obtained by linear interpolation. Other costs, such as ramping costs, variable operating & maintenance costs and start-up or shut-down costs, are not considered. Operating costs are expressed in nominal terms.

	Operating efficiency (-)	Carbon intensity (tCO <sub>2</sub> /MWh)	Operating cost (2017) (€/MWh)	Operating cost (2030) (€/MWh)
Nuclear	0.33	0	5.0	5.0
SPP - Lignite (old)	0.30	1.11	13.2	13.2
SPP - Lignite (new)	0.40	0.83	9.9	9.9
SPP - Coal (old)	0.30	1.18	15.9	34.9
SPP - Coal (new)	0.40	0.89	12.0	26.1
SPP - Natural gas	0.30	0.60	70.1	100.3
CCGT - Natural gas (old)	0.40	0.45	52.6	75.2
CCGT - Natural gas (new)	0.58	0.31	36.3	51.9
OCGT - Natural gas	0.35	0.52	60.1	86.0
ICE - Oil	0.30	0.83	85.8	141.5

gies is assumed persistent over the period 2017-2061, i.e., replaced by similar technologies if they reach the end of their lifetime.

Focusing on the electric power sector and its interaction with the EU ETS, industrial emissions are based on the relation between EUA prices and CO<sub>2</sub> emissions provided by Landis (2015). In our analysis, we calculate the emissions for the energy-intensive industry via the quartic polynomial fit of the relation between EUA prices and the exponential abatement as obtained from PACE, a computable general equilibrium model.<sup>15,16</sup> The resulting emissions are rescaled according to the current share of the energy-intensive industry in the emissions covered by the ETS (43.5% according to Agora Energiewende (2016)) and limited to the current emission level (737 MtCO<sub>2</sub> (Sandbag, 2017b)). Since these curves are only available for 2020, 2025, 2030, 2035, 2040, 2045 and 2050, intermediate values are obtained via linear interpolation. Post-2050, we extrapolate Landis' results using the evolution of CO<sub>2</sub> emissions between 2045 and 2050.

<sup>15</sup>Landis (2015) expresses the EUA price in €2010. In this paper, we employ a constant inflation rate of 2%/year to link these results to the nominal EUA price.

<sup>16</sup>Schopp et al. (2015) employ a quadratic abatement cost curve to represent abatement costs, obtained by least-square fits w.r.t. the results of Landis (2015). Similarly, Perino and Willner (2017) employ a time-invariant quadratic abatement cost curve. In this paper, however, we propose to employ the quartic polynomial fit of the exponential of abatement, which captures the relation between emissions and EUA prices more accurately, especially at high abatement values (Landis, 2015). As discussed in Section 1, the reinforcing effect that exists between increasing abatement costs related to meeting the future emissions cap and the cancellation volume requires accurately describing marginal abatement costs in quantitative assessments of the impact of the MSR. This representation of the relation between emissions and EUA prices via a high-degree polynomial is enabled by our solution concept based on ADMM.

Table 4. Existing capacity of considered electricity generation technologies, based on ENTSO-E (2018b,a). The division in ‘old’ and ‘new’ coal-, lignite- and gas-fired technologies and their availability is based on calibration w.r.t. their historical shares in the electricity generation mix (2017) (ENTSO-E, 2018b). Installed power plant capacity was not available for Malta. Electricity generation in Croatia, Malta and Luxembourg was omitted from the fuel share calculation due to data availability. Investment costs, lifetimes and lead times are based on International Energy Agency (IEA) (2015) (median values, worldwide). No investments in ‘old’ technologies are considered. Currently installed capacity is decommissioned linearly according to the assumed average age and lifetime. Investment costs are expressed in nominal terms.

	Investment cost (k€/MW)	Lifetime (years)	Lead time (years)	Current capacity (MW)	Average age (years)	Fuel share (historical) (%)	Fuel share (simulation) (%)	Availability (calibrated) (%)
Nuclear	3,672	50	10	118,406	25	26.7	25.8	80
SPP - Lignite (old)	-	40	-	48,656	20	9.5	9.8	70
SPP - Lignite (new)	1,540	40	8	2561	10			70
SPP - Coal (old)	-	40	-	75,788	20	9.1	13.6	50
SPP - Coal (new)	1,232	40	8	18,947	10			70
SPP - Natural gas	1,698	40	4	7,569	20	15	16	85
CCGT - Natural gas (old)	-	25	-	37,995	10			85
CCGT - Natural gas (new)	760	25	4	151,982	5			85
OCGT - Natural gas	524	15	2	6,576	10	0.8	0	85
ICE - Oil	262	15	1	20,364	10			85
Solar	1,077	20	1	106,038	3	3.5	3.2	100
Wind - onshore	1,353	20	1	153,539	3	9.6	9.0	100
Wind - offshore	3,748	20	1	15,780	2	1.5	1.3	100
			Total	764,201		75.9	78.7	

487 Note that for the starting year of our analysis (i.e., 2017), investments are not allowed.  
488 The electricity demand in 2017-2018 must thus be met by already installed capacity, hence,  
489 the availability of the current installed thermal capacity may be calibrated by comparing the  
490 fuel shares resulting from the model in the reference case and those reported by ENTSO-E  
491 and Sandbag for the year 2017 (ENTSO-E, 2018b; Sandbag, 2017b) and iteratively updating  
492 the availability factors of legacy capacity. The resulting availability and fuel share of each  
493 technology is reported in Table 4. Furthermore, we consider an EUA price of 5€/tCO<sub>2</sub> in  
494 2017-2018, reflecting the assumption that emitters procured EUAs prior to the price hike  
495 in the second half of 2018 (Fig. 1). After calibration of the availability of legacy capacity,  
496 the simulated CO<sub>2</sub> emissions of the power sector in 2017 amount to 986 MtCO<sub>2</sub> in our  
497 reference case, close to historical CO<sub>2</sub> emissions of 1,013 MtCO<sub>2</sub> (Sandbag, 2017a). The  
498 CO<sub>2</sub> emissions of the energy-intensive industry in 2017 are fixed to 737 MtCO<sub>2</sub> (Sandbag,  
499 2017a).

## 500 5. Results & Discussion

501 First, we discuss the impact of the strengthened EU ETS on the power sector in the  
502 reference scenario (Section 5.1). In Section 5.2, we study how this impact depends on  
503 parameter assumptions in a number of policy scenarios. Last, Section 5.3 analyzes the total  
504 cost associated with these policies.

### 505 5.1. The impact of the strengthened EU ETS under reference assumptions

506 We focus our attention on (i) the change in EUA prices, EUA supply & surplus, MSR  
507 holdings and cancellation volumes; (ii) CO<sub>2</sub> emissions and (iii) the evolutions in the power  
508 sector, as well as the associated average wholesale electricity price and the REC price (Fig.  
509 2). To underpin the evolutions in the ETS, we also show the developments in electricity  
510 generation capacity, including the deployment of renewable technologies. As a benchmark,  
511 we compare our reference policy scenario of the strengthened ETS ('MSR2018') with the  
512 policies in place before 2018 ('MSR2015'): the LRF is set to 1.74%<sup>17</sup>, no additional RES  
513 target is enforced for 2030, the intake and outflow rate of the MSR prior to 2024 is not  
514 doubled and no cancellation is enforced.

#### 515 5.1.1. Evolution of the EUA price, EUA supply, MSR holdings & cancellation volume

516 As we will discuss at length below, the cancellation provision of the strengthened MSR  
517 leads to a EUA price increase (+303%) and a decrease in cumulative emissions (13.9 GtCO<sub>2</sub>)

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<sup>17</sup>An increase in the LRF has been under discussion since 2015 and is in line with the European Commission's pledge at COP21 in 2015, but was only enforced by law by the European Union in 2018 (European Union, 2018). Motivated by the lack of response of the market in 2015 (Fig. 1), we opt to keep the LRF at 1.74% in the 'MSR2015' scenario. However, one could argue that the market should have anticipated this policy change and, hence, our counter-factual reference scenario 'MSR2015' is not sufficiently ambitious, inflating the importance of the 2018 legislative package. Therefore, we investigate the impact of each of the changes to the ETS (increased LRF, doubled intake rates of the MSR and cancellation) and the RES targets individually in Section 5.2.

518 that significantly exceeds the emission reductions triggered by the increased LRF (8.3  
519 GtCO<sub>2</sub>). At the root of these emission reductions lies the self-reinforcing effect that ex-  
520 ists between the marginal cost of abatement associated with the future emissions cap and  
521 the cancellation volume (Bruninx et al., 2019). With the increase of the LRF, the marginal  
522 cost of meeting the emissions cap increases, which in turn makes banking allowances for  
523 future use more profitable. However, this in turn increases the surplus today and in the near  
524 future, hence, the volume of allowances absorbed and cancelled by the MSR. This feedback  
525 effect translates the cancellation provision, active over multiple decades, into a strong signal  
526 for decarbonization today.

527 As such, the revised MSR and the increase of the LRF (‘MSR2018’) results in a 303%  
528 increase in the price of EUAs, from 6.8 €/tCO<sub>2</sub> to 27.4 €/tCO<sub>2</sub> in 2019 (Fig. 2a). As the  
529 EUA price profile is inversely proportional to the discount factor if the aggregate surplus is  
530 non-zero (Perino and Willner, 2017), i.e.,  $\lambda_y^{\text{ETS}} \sim \frac{1}{(1+r)^y}$ ,  $\forall y \in \mathcal{Y}$ , the price of EUAs will  
531 continue to be 303% higher up to 2049, when the surplus reaches zero in the ‘MSR2015’  
532 scenario. After 2049, the price in the ‘MSR2018’ scenario increases with the discount factor,  
533 while the price in the ‘MSR2015’ scenario is such that supply of EUAs equals its demand.

534 The combination of the cancellation policy and the increased LRF results in a lower net  
535 supply of EUAs over the whole horizon compared to the ‘2015’ scenario (Fig. 2c). The  
536 increased LRF lowers the *annual cap* (Fig. 2c, ‘C’), while the MSR and cancellation further  
537 lower the *net supply* (Fig. 2c, ‘S’). In the first years of operation of the MSR, the doubled  
538 intake rates and the high TNAC lead to an aggressive decrease in the net supply (Fig. 2c).

539 In the ‘MSR2018’ scenario, we observe that CO<sub>2</sub> emissions and net supply approximately  
540 coincide between 2020 and 2023, such that the TNAC remains relatively stable between  
541 1,734 and 1,911 MtCO<sub>2</sub> (Fig. 2d). After 2023, the combination of the lower MSR intake  
542 rate and the elevated EUA price, triggered by the above-mentioned self-reinforcing effect,  
543 causes CO<sub>2</sub> emissions to fall below the net supply, resulting in increasing TNAC levels (Fig.  
544 2d). The MSR peaks at 3,348 MtCO<sub>2</sub> in 2022, just before the start of the cancellation. After  
545 attaining its maximum in 2035 (3,067 MtCO<sub>2</sub>), the TNAC decreases when CO<sub>2</sub> emissions  
546 start to exceed the net supply. Note that, contrary to the objective of the strengthened  
547 MSR, the TNAC remains above the 833 MtCO<sub>2</sub> threshold for several decades, which causes  
548 the MSR to absorb and cancel EUAs from 2019 till 2059, when the emissions cap becomes  
549 zero (Fig. 2d). In contrast, the TNAC level in the ‘MSR2015’ scenario rapidly decreases  
550 from 2019 onwards (Fig. 2d), because the lower EUA price keeps CO<sub>2</sub> emissions above net  
551 supply in 2020-2029 (Fig. 2c) and the MSR absorbs EUAs until 2029 and in 2036-2040.  
552 Because there is no cancellation, the MSR continues to increase and peaks in 2041-2045,  
553 when it contains 4,172 MtCO<sub>2</sub>. In 2029-2034 and 2040-2045, the net supply of EUAs equals  
554 the cap, whereas after 2045 the MSR releases allowances, increasing the annually available  
555 net annual supply to 100 million above the CO<sub>2</sub> emissions cap. Due to a brief period in  
556 which CO<sub>2</sub>-emissions remain below the emissions cap after 2030, the TNAC temporarily  
557 increases between 2030 and 2035, but drops again to values below the 833 MtCO<sub>2</sub> threshold  
558 by 2040. At the end of our horizon (2061), the MSR still contains 2,639 MtCO<sub>2</sub>, which  
559 under the ‘MSR2015’ policies are to be released over the period 2061-2089.

560 In total, 13,009 MtCO<sub>2</sub> or 29.7% of the cumulative cap (assuming the 2.2% LRF post-  
561 2020) is taken out of the system via the cancellation policy.<sup>18</sup> The highest cancellation  
562 volume is recorded in 2023, when 2,783 MtCO<sub>2</sub> is taken out of the system.<sup>19</sup> Note that  
563 the cancellation volume in 2023 exceeds the volume of back-loaded and unallocated EUAs  
564 (1,600 MtCO<sub>2</sub>, Table 2) placed in the MSR.

### 565 5.1.2. CO<sub>2</sub> emissions from the energy-intensive industry & power sector

566 Cumulative CO<sub>2</sub> emissions equal 30,812 MtCO<sub>2</sub> in the ‘MSR2018’ scenario and are 41%  
567 or 21,334 MtCO<sub>2</sub> below the cumulative cap before the strengthening of the ETS (52,150  
568 MtCO<sub>2</sub>).<sup>20</sup> Around 40% of this decrease (8,332 MtCO<sub>2</sub>) is due to the increased linear  
569 reduction factor, which lowers the cumulative cap from 52,150 MtCO<sub>2</sub> to 43,819 MtCO<sub>2</sub>.  
570 The remaining 60% of this decrease is the result of the cancellation policy (13,009 MtCO<sub>2</sub>).

571 Power sector-related CO<sub>2</sub> emissions decrease from 19,115 MtCO<sub>2</sub> to 11,820 MtCO<sub>2</sub> (Fig.  
572 2e). The CO<sub>2</sub> emissions of the energy-intensive industry equal 18,993 MtCO<sub>2</sub> (‘MSR2018’)  
573 and 30,393 MtCO<sub>2</sub> (‘MSR2015’). The energy-intensive industry is not yet fully decarbonized  
574 by 2061, despite the strengthened ETS (Fig. 2e). In the ‘MSR2015’ case, we only observe  
575 significant decarbonization in the energy-intensive industry post 2050 (Fig. 2e). These, in  
576 some cases abrupt, changes in CO<sub>2</sub> emissions are, of course, a direct result of our representa-  
577 tion of (i) the energy-intensive industry and their abatement options and (ii) the investment  
578 options in the power sector. For example, by 2020, we observe a 18.9% decrease in CO<sub>2</sub>  
579 emissions (3.9% in the ‘MSR2015’ case) compared to 2017-levels. However, two-thirds of  
580 this drop in CO<sub>2</sub> emissions stems from fuel switching in the power sector (i.e., replacing  
581 lignite- and coal-fired generation with natural gas-fired generation using existing capacity),  
582 which is realistically represented in the model (Section 5.1.3).

### 583 5.1.3. Evolutions in the power sector, electricity and REC prices

584 The CO<sub>2</sub> emissions in the power sector (Fig. 2e) are directly linked to changes of the  
585 electricity generation fuel mix (Fig. 2f). Despite the large difference in EUA prices and  
586 supply between the ‘MSR2015’ and the ‘MSR2018’ case, the trends in the power sector  
587 are very similar (Fig. 2f). However, as the EUA price required for certain technology

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<sup>18</sup>We calculate total cancellation volume as the cumulative difference between the cap and CO<sub>2</sub> emissions. The cumulative cap equals 43,819 MtCO<sub>2</sub> and is calculated as the sum of the annual cap as of 2018, the effective supply in 2017 (1,764 MtCO<sub>2</sub>), the surplus at the end of 2017 (1,693 MtCO<sub>2</sub>), back-loaded allowances (900 MtCO<sub>2</sub>) and unallocated allowances in Phase 3 (700 MtCO<sub>2</sub>) (Sandbag, 2017a).

<sup>19</sup>As a comparison, Perino and Willner (2017) calculate that 1700 MtCO<sub>2</sub> is canceled in 2023, while Carlén et al. (2018) find 2400 MtCO<sub>2</sub>. Sandbag (2017a) reports a cancellation volume in 2023 between 2,791 and 3,123 MtCO<sub>2</sub>, depending on their assumptions w.r.t. CO<sub>2</sub> emission trajectories.

<sup>20</sup>The cumulative CO<sub>2</sub> emissions in the ‘MSR2018’ policy scenario are 37.8% or 18,695 MtCO<sub>2</sub> below those observed in the ‘MSR2015’ scenario over the period 2017-2061. In the ‘MSR2015’ scenario, the MSR is, however, not fully depleted by the end of 2061 in absence of a cancellation policy. Consequently, cumulative CO<sub>2</sub> emissions (49,507 MtCO<sub>2</sub>) are 2,639 MtCO<sub>2</sub> (the holdings of the MSR at the end of 2061) lower than the cumulative cap (52,150 MtCO<sub>2</sub>) (Fig. 2c-2e). As these allowances are to be released after 2061, CO<sub>2</sub> emissions will be equal to the cumulative cap. Therefore, we will compare CO<sub>2</sub> emissions to the cumulative cap before the strengthening of the ETS.

588 shifts is reached earlier, these transitions occur sooner in the ‘MSR2018’ scenario. Before  
589 2030, we observe fuel switching (Delarue and D’haeseleer, 2008) from coal- and lignite-fired  
590 generation to gas-fired generation (Fig. 2f). After 2030, onshore wind power becomes the  
591 dominant electricity generation technology due to increasing EUA prices and falling wind  
592 power investment costs. Prior to 2027, wind and solar power deployment is similar in both  
593 scenarios because of the binding RES target & support under the form of REC. At the same  
594 time, nuclear capacity is gradually phased out, but is partially replaced by new nuclear units  
595 after 2035 (Fig. 2f). This last effect is less pronounced in the ‘MSR2015’ scenario. Nuclear  
596 units generate, on average, 435 TWh/a in the period 2040-2061 in the ‘MSR2018’ scenario,  
597 compared to 72 TWh/a under the ‘MSR2015’ policy.

598 The increased EUA price is transferred to electricity consumers through elevated EOM  
599 prices, as illustrated by the average annual electricity prices  $\lambda_y^{\text{EOM}}$  (Fig. 2b). Compared  
600 to the electricity prices in the ‘MSR2015’ scenario, differences in average prices range from  
601 -6.9 €/MWh to +19.6 €/MWh. Across the model horizon, the average electricity price  
602 is 5.2 €/MWh higher in the ‘MSR2018’ case. However, in the period 2020-2040, these  
603 differences are more pronounced, with electricity prices that are on average 10.3 €/MWh  
604 higher. After 2040, the difference reduces, on average, to +0.5€/MWh. Indeed, because  
605 the power sector is almost completely decarbonized by 2040 in the ‘MSR2018’ scenario, the  
606 EUA price becomes a minor component in the EOM price.

607 The MSR and LRF also affect the price of RECs required to reach the RES targets.  
608 Compared to the ‘MSR2015’ case, the price of a REC is, on average over the period 2020-  
609 2030, 7.9 €/MWh lower under the strengthened ETS, lowering the overall out-of-market  
610 payments required to meet the targets from 45.3 B€ (‘MSR2015’) to 20.4 B€ (‘MSR2018’).  
611 Note furthermore that, due to the combination of EUA prices, RES targets and falling  
612 investment costs of renewable technologies, the resulting RES share in 2030, expressed as  
613 a percentage of the load in that year, equals 57.8% in the ‘MSR2018’ scenario, whereas it  
614 equals 32.6% in the ‘MSR2015’ case.

615 However, to properly interpret these changes in, i.a., electricity, EUA and REC prices,  
616 one has to compare the overall change in total cost induced by the strengthened ETS, an  
617 issue which we will return to in Section 5.3.

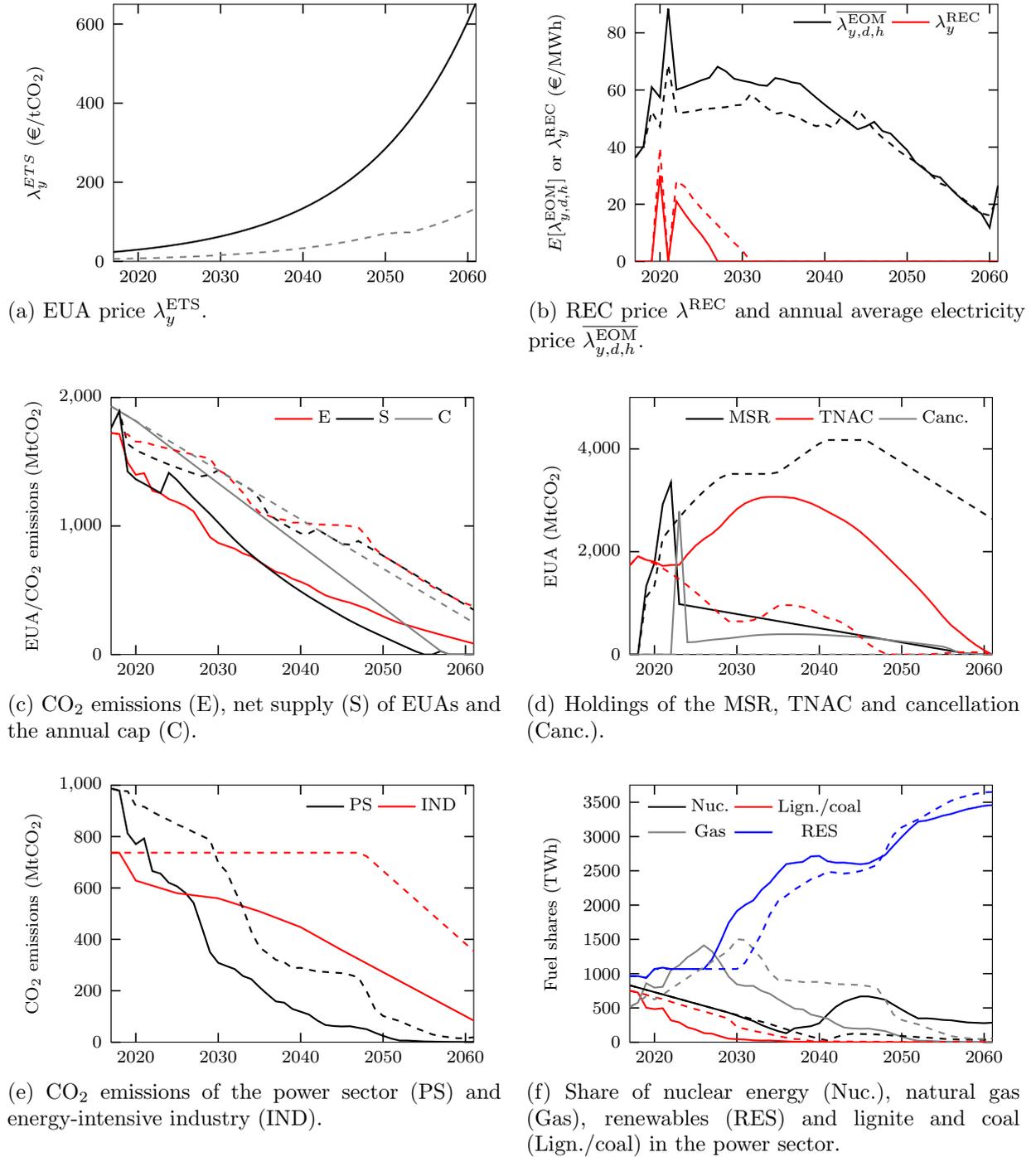


Figure 2. The price of ETS emission allowances (Fig. 2a), the average annual electricity price and REC price per year (Fig. 2b) and the net supply of allowances, accounting for the impact of the MSR (Fig. 2c) in the ‘MSR2018’ and ‘MSR2015’ scenarios. Figures 2d-2f show the TNAC, holdings of the MSR and the amount of cancelled allowances (Fig. 2d), the CO<sub>2</sub> emissions of the power sector and energy-intensive industry (Fig. 2e) and the fuel shares in the power sector (Fig. 2f). The dashed lines are the results of the ‘MSR2015’-case, whereas the solid lines correspond to the ‘MSR2018’-case. All prices are expressed in real terms (€2017), assuming inflation at 2%/year.

Table 5. The considered policy scenarios, which differ w.r.t. the assumed linear reduction factor (LRF) after 2021, the intake and outflow rates of the MSR in the period 2019-2023, the consideration of the cancellation provision and the RES target imposed on the power sector in the two reference years (2020 and 2030). Recall that in all policy scenarios the 2020 renewable energy target of 34% in the power sector remains binding after 2020. As of 2030, the 2020 or 2030 renewable energy target is assumed to be binding, depending on which is more stringent.

Policy scenario	LRF	MSR 2019-2023	Cancellation	Power sector RES target
MSR2018	2.2%	24% - 200 MtCO <sub>2</sub>	✓	34% (2020) - 32% (2030)
MSR2015	1.74%	12% - 100 MtCO <sub>2</sub>	✗	34% (2020)
MSR2018-LRF1.74	1.74%	24% - 200 MtCO <sub>2</sub>	✓	34% (2020) - 32% (2030)
MSR2018-RES50	2.2%	24% - 200 MtCO <sub>2</sub>	✓	34% (2020) - 50% (2030)
MSR2018-NC	2.2%	24% - 200 MtCO <sub>2</sub>	✗	34% (2020) - 32% (2030)

## 5.2. Policy scenario & sensitivity analysis

In our analysis above, one is not able to identify how much each of the changes in policy (i.e., the increased LRF, the higher intake and outflow rates of the MSR, the introduction of cancellation or the 2030 RES target) contribute to the changes discussed above. Therefore, to isolate the impact of the major changes to the ETS and 2030 renewable energy targets that have been adopted in 2018, we consider five policy scenarios, summarized in Table 5. ‘MSR2018’ is our central reference scenario, in which the strengthened MSR is deployed, the LRF is increased to 2.2% as of 2021, a power sector renewable energy target of 32% by 2030 is enforced and the cancellation provision of the MSR is enabled. This scenario is designed to reflect the current policies. In our counter-factual scenario ‘MSR2015’, the renewable energy target in the power sector is 34% by 2020, the LRF remains at 1.74%, the intake and outflow rates of the MSR are always equal to 12% of the TNAC and 100 MtCO<sub>2</sub> and cancellation of EUAs is not considered. This scenario is in line with the policies instated in 2015. The remaining policy scenarios are variations on the ‘MSR2018’ scenario, in which one of the policy parameters is adapted: the LRF is set to 1.74% in scenario ‘MSR2018-LRF1.74’; a more stringent power sector RES target of 50% by 2030 is enforced in scenario ‘MSR2018-RES50’ and ‘MSR2018-NC’ case does not consider the cancellation provision.

In addition, we stress-test the robustness of our results in each of these policy scenarios w.r.t. key assumptions on investment and operating costs in the power sector, the options to invest in new nuclear or lignite and coal-fired power plants, demand growth, abatement costs in industry and discount rates, as summarized in Table 6. For each of our policy scenarios, we consider 16 alternative cases, in addition to our reference assumptions on the parameters listed in middle column in Table 6. In each of those cases, we vary one of these parameters *ceteris paribus* to the values indicated in Table 6. For example, an increased demand growth rate may reflect increased abatement-driven electrification in the energy-intensive industry or other sectors – an effect we do not explicitly model due to the inherent uncertainty on the link between abatement and electrification, see Section 3.1.3 and McKinsey & Company (2018) –, less successful energy efficiency measures or an increased uptake of certain technologies, such as power-to-X, heat pumps or electric vehicles.

Table 6. Assumptions on critical parameters in our sensitivity analysis. The central values are our reference assumptions. For each policy scenario, we consider 16 alternative sets of parameters, in which we vary the assumption on one of the parameters listed below, *ceteris paribus*.

	Considered parameter values		
Reduction investment cost on- & offshore wind power	-1%/year	-2%/year	-3%/year
Reduction investment cost solar power	-1%/year	-2%/year	-3%/year
Limit on investment in nuclear power plants	0	$\frac{CP_{2017} - CP_y}{CP_{2017} - CP_y}$	$\infty$
Limit on investment in lignite- & coal-fired power plants	0	$\frac{CP_{2017} - CP_y}{CP_{2017} - CP_y}$	$\infty$
Natural gas price (w.r.t reference scenario)	-50%	+/-0%	+50%
Demand growth rate (w.r.t reference scenario)	-50%	+/-0%	+100%
Abatement cost in industry (w.r.t reference scenario) <sup>21</sup>	-20%	+/-0%	+20%
Nominal discount rate	8%	10%	12%

647 In addition, these results allow exposing the strength of the self-reinforcing feedback  
648 effect between the future marginal abatement costs and the cancellation volume (Bruninx  
649 et al., 2019) within each policy scenario considering a MSR with a cancellation provision.  
650 For example, elevated natural gas prices will increase the cost of switching from lignite and  
651 coal-based generation to natural gas-fired generation in the power sector. This provides an  
652 incentive to bank allowances in the near future, elevating the surplus, hence, the number of  
653 allowances absorbed and cancelled by the MSR.

654 In what follows, we first dive into the performance of the ETS in these policy scenarios  
655 (Section 5.2.1). Subsequently, the changes in the power sector are discussed in Section 5.2.2.  
656 Last, the implications on total costs are discussed (Section 5.3).

### 657 5.2.1. Bird's eye overview of changes in the ETS

658 Figure 3 summarizes the results per policy scenario, as indicated by the different colors,  
659 considering seventeen different sets of input parameters (see above). As Fig. 3 illustrates,  
660 the introduction of the 2018-legislative package triggers significant ETS price increases and  
661 CO<sub>2</sub> emissions reductions w.r.t. those observed under the ‘MSR2015’ scenario. However,  
662 several additional observations may be made.

663 First, increasing the LRF from 1.74% to 2.2% as of 2021 reduces the cumulative cap  
664 by 8.3 GtCO<sub>2</sub> from 52.2 GtCO<sub>2</sub> to 43.9 GtCO<sub>2</sub>, which leads to a strong reduction in CO<sub>2</sub>  
665 emissions across all parameter sets (Fig. 3, E). On average, cumulative CO<sub>2</sub> emissions over  
666 the period 2017-2061 amount to 49.2 GtCO<sub>2</sub> in the ‘MSR2015’ scenario and to 47.9 GtCO<sub>2</sub>  
667 in the ‘MSR2018-LRF1.74’-case, which is to be compared with 31.0 GtCO<sub>2</sub> in our reference  
668 ‘MSR2018’-case.<sup>22</sup> In the policy scenario with cancellation but without the increased LRF  
669 (‘MSR2018-LRF1.74’), cancellation volumes (4.1 GtCO<sub>2</sub> under reference assumptions) re-  
670 main modest compared to those observed in the reference policy scenario ‘MSR2018’. At the

<sup>21</sup>In scenario ‘-20%’, the energy-intensive industry abates 20% less compared to the reference scenario in response to the same EUA price.

<sup>22</sup>Recall that under the ‘MSR2015’ scenario, the MSR is not depleted at the end of the model horizon, hence, cumulative CO<sub>2</sub> emissions may increase to the cap (52.2 GtCO<sub>2</sub>).

671 root of this difference in cumulative emissions under policy scenarios ‘MSR2018-LRF1.74’  
672 and ‘MSR2018’ lies the self-reinforcing feedback effect between the marginal abatement cost  
673 to meet the future cap and the cancellation volume (Bruninx et al., 2019). Indeed, increasing  
674 the LRF reduces the supply of allowances, hence, increases the cost of meeting the cap in the  
675 future. Consequently, this provides an incentive to bank allowances today, hence, increases  
676 the TNAC, the volume of allowances absorbed and cancelled by the MSR (Fig. 3, C). More-  
677 over, EUA prices remain low (Fig. 3,  $\lambda_{2020}^{ETS}$ ) and equal to 7.33 €/tCO<sub>2</sub> (‘MSR2015’) and 8.40  
678 €/tCO<sub>2</sub> (‘MSR2018-LRF1.74’). This allows higher CO<sub>2</sub> emissions (Fig. 3, E), especially  
679 from the energy-intensive industry (Fig. 3, E-IND): 29.6 GtCO<sub>2</sub> (‘MSR2018-LRF1.74’) to  
680 30.4 GtCO<sub>2</sub> (‘MSR2015’), compared to 19.0 GtCO<sub>2</sub> in the ‘MSR2018’ scenario. In the power  
681 sector, this effect is less pronounced and more dependent on cost evolutions, interactions  
682 with the RES targets and the availability of certain technologies. Average cumulative CO<sub>2</sub>  
683 emissions from the power sector equal 18.5 GtCO<sub>2</sub> (‘MSR2018-LRF1.74’) to 18.9 GtCO<sub>2</sub>  
684 (‘MSR2015’), compared to 12.0 GtCO<sub>2</sub> in the reference policy scenario (Fig. 3, E-PS).

685 Second, the introduction of a stringent RES target in 2030 has a modest impact on the  
686 cumulative CO<sub>2</sub> emissions (Fig. 3, E). Averaged across the seventeen results per policy  
687 scenario, moving to a 50% RES target reduces the cumulative CO<sub>2</sub> emissions from 31.0  
688 GtCO<sub>2</sub> to 30.2 GtCO<sub>2</sub>. These CO<sub>2</sub> emission reductions are entirely realized in the power  
689 sector and occur during a period of continued surplus in the ETS, hence trigger higher  
690 cancellation volumes (Fig. 3, C). On average, cancellation volumes increase from 12.8 GtCO<sub>2</sub>  
691 (‘MSR2018’) to 13.6 GtCO<sub>2</sub> (‘MSR2018-RES50’). Consequently, the expected EUA price-  
692 depressing effect of RES targets is dampened, as the additional excess EUAs are cancelled.  
693 In fact, average EAU prices in 2020 are slightly higher in the ‘MSR2018-RES50’ scenario:  
694 30.2 €/ton CO<sub>2</sub> compared to 30 €/ton CO<sub>2</sub> in the reference policy scenario ‘MSR2018’. This  
695 marginally decreases CO<sub>2</sub> emissions from the energy-intensive industry from 19.0 GtCO<sub>2</sub> to  
696 18.9 GtCO<sub>2</sub> under reference assumptions.

697 Third, the cancellation provision of the strengthened MSR leads to additional CO<sub>2</sub> emis-  
698 sion reductions (Figure 3, E). Cancellation volumes range from 5.7 GtCO<sub>2</sub> to 17.8 GtCO<sub>2</sub>,  
699 with an average of 12.8 GtCO<sub>2</sub>, in the ‘MSR2018’ scenario (Figure 3, C). Note that a strong  
700 interaction exists between the LRF and the cancellation provision due to the self-reinforcing  
701 feedback effect between the marginal abatement cost associated with meeting the future cap  
702 and the cancellation volume (see also first paragraph of this section). Higher linear reduction  
703 factors lead to (1) lower auction volumes and (2) higher EUA prices, hence higher TNAC  
704 volumes and absorption rates, which both may trigger higher cancellation volumes. Com-  
705 pare, e.g., cancellation volumes under ‘MSR2018’ policy assumptions and those observed  
706 in the ‘MSR2018-LRF1.74’ scenario (Fig. 3, C). As discussed above, a similar interaction  
707 exists between RES targets and the cancellation provision. However, this effect appeared  
708 to be less pronounced, as evidenced by the limited difference in cancellation volumes. In  
709 the policy scenarios without a cancellation provision, the difference between the cumulative  
710 cap and the cumulative emissions is stored in the MSR. This may depress emissions w.r.t.  
711 the cumulative cap in the period 2017-2061, but these allowances are, in principle, to be  
712 released post 2061. The holdings of the MSR at the end of 2061 equal on average 9.2 GtCO<sub>2</sub>  
713 (‘MSR2018-NC’) and 3.0 GtCO<sub>2</sub> (‘MSR2015’).

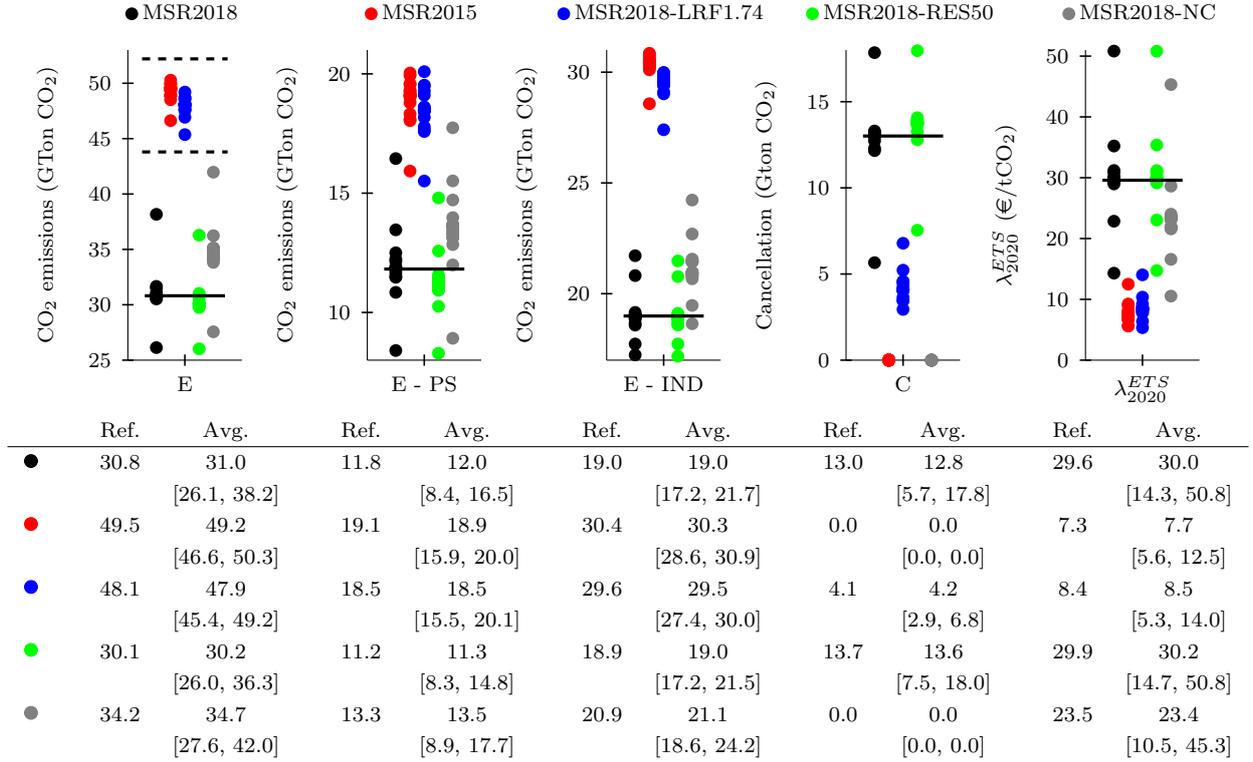


Figure 3. Cumulative CO<sub>2</sub> emissions (E) over the period 2017-2061, split over the energy-intensive industry (E-IND) and power sector (E-PS), cumulative cancellation (C) and expected EUA prices in 2020  $\lambda_{2020}^{ETS}$ , grouped per policy scenario, as indicated by the different colors. The solid black line indicates the value in the reference scenario. The dashed lines in Fig. 3 (E) indicate the cumulative caps assuming a LRF of 1.74% or 2.2%. Recall that in policy scenarios without a cancellation provision (‘MSR2015’ and ‘MSR2018-NC’), effective cumulative CO<sub>2</sub> emissions may increase to this cap post 2061. The table below summarizes the results for the five selected indicators under reference assumptions (‘Ref.’), averaged across the seventeen results per policy scenario (‘Avg.’), the minimum and maximum value (intervals).

714 Figure 3 also reveals significant differences in the results within each policy scenario,  
715 which all may be explained via their effect on today’s perception of the marginal abate-  
716 ment cost today and in the future via the aforementioned feedback effect (Bruninx et al.,  
717 2019). For example, in the ‘MSR2018’ scenario, the cumulative CO<sub>2</sub> emissions range from  
718 26.1 GtCO<sub>2</sub> to 38.2 GtCO<sub>2</sub>. These ‘extreme’ scenarios are triggered by different discount  
719 rates: a lower discount rate (8%/year) triggers higher EUA prices today, as future marginal  
720 abatement costs are valued higher today, (Fig. 3,  $\lambda^{ETS}$ ), which advances coal-natural gas  
721 switching (Section 5.2.2), depressing CO<sub>2</sub> emissions in the power sector (Fig. 3, E-PS). Con-  
722 versely, high discount rates (here: 12%/year) depress prices today, which delays coal-natural  
723 gas switching and, consequently, results in higher CO<sub>2</sub> emissions in the power sector: 16.5  
724 GtCO<sub>2</sub>, compared to 8.4 GtCO<sub>2</sub> (discount rate of 8%/year) or 11.8 GtCO<sub>2</sub> (discount rate  
725 of 10%) (Fig. 3, E-PS). Advancing the switch to natural gas furthermore leads to a larger  
726 surplus in allowances, consequently, higher cancellation volumes: 17.8 GtCO<sub>2</sub>, compared  
727 to 13.0 GtCO<sub>2</sub> (reference case) or 5.7 GtCO<sub>2</sub> (12 %/year) (Fig. 3, C). Remarkably, CO<sub>2</sub>  
728 emissions from the energy-intensive industry are relatively stable, regardless of the discount

729 rate, and range from 17.2 GtCO<sub>2</sub> (8%/year) to 21.7 GtCO<sub>2</sub> (12%/year) (Fig. 3, E-IND). As  
730 expected, these variations triggered by the discount rate are less pronounced in policy sce-  
731 narios characterized by lower EUA prices ('MSR2015' and 'MSR2018-LRF1.74'). Neglecting  
732 the variations caused by the discount rate leads to a more 'stable' picture per policy sce-  
733 nario: in the reference policy scenario, cumulative CO<sub>2</sub> emissions range from 30.5 GtCO<sub>2</sub>  
734 to 31.7 GtCO<sub>2</sub> and cancellation volumes from 12.2 GtCO<sub>2</sub> to 13.3 GtCO<sub>2</sub> (Fig. 3, E and  
735 C). This underlines the robustness of our results regarding EUA prices, cumulative emis-  
736 sions and cancellation volumes w.r.t. assumptions on the availability of certain technologies,  
737 fuel prices and electricity demand growth. Especially the robustness to assumptions on the  
738 electricity demand growth is relevant in this context, as we do not consider the impact of  
739 abatement- or policy-driven electrification in the energy-intensive industry or other sectors.  
740 This robustness may be explained by the observation that the power sector evolves to a  
741 low-carbon system, dominated by renewable energy sources, in all considered scenarios, as  
742 we will expose in Section 5.2.2. As such, these changes in electricity demand have a limited  
743 impact on the emissions, hence, actions of the MSR. However, variations are to be observed  
744 in the emissions from the energy-intensive industry (17.2 GtCO<sub>2</sub> to 20.8 GtCO<sub>2</sub>, Fig. 3,  
745 E-IND) and the power sector (10.8 GtCO<sub>2</sub> to 13.5 GtCO<sub>2</sub>, Fig. 3, E-PS). The exploration  
746 of these CO<sub>2</sub> emission displacements and their relation to changes in the power sector is the  
747 topic at hand in the next section.

#### 748 *5.2.2. A more detailed overview of changes in the power sector*

749 As expected, policy scenarios that are characterized by high EUA prices, such as our  
750 reference scenario, exhibit (1) higher electricity prices and (2) lower REC prices (Fig. 4).  
751 High EUA prices trigger a change in the electricity generation mix (see further) and entail a  
752 cost for CO<sub>2</sub>-emitting electricity generation technologies, which is transferred to consumers  
753 via increased electricity prices, required for generators to recover their investment costs.  
754 These increased electricity prices, however, also depress the required support under the  
755 form of RECs to ensure cost-recovery for RES-based generators (see also Section 5.3).

756 Policy scenarios characterized by a high cumulative cap and low ETS prices, i.e.,  
757 'MSR2015' and 'MSR2018-LRF1.74' tolerate higher shares of CO<sub>2</sub>-intensive forms of elec-  
758 tricity generation. Indeed, in these scenarios, the switch to natural gas, and subsequently,  
759 RES, is delayed. In 2030, lignite, coal and oil-fired electricity generation still account, on av-  
760 erage, for 252 TWh and 229 TWh, although in none of the considered cases new investment  
761 in these technologies occur. In contrast, in all other policy scenarios, the output of these  
762 technologies drops on average below 68 TWh by 2030. Similar trends are observed in the  
763 average output of gas-fired power plants, which ranges from 842 TWh ('MSR2018-RES50')  
764 to 1,427 TWh ('MSR2015'). Note that not considering the cancellation provision leads to  
765 higher fossil fuel shares, whereas more ambitious RES-targets lead to the opposite effect.

766 Policy scenarios 'MSR2018', 'MSR 2018-NC' and 'MSR 2018-RES50' are characterized  
767 by similar RES developments by 2030. On average, RES are responsible for 1,851 TWh  
768 in our reference policy scenario by 2030. Not considering the cancellation policy depresses  
769 EUA prices, which leads to somewhat slowed developments of RES. A stringent RES target  
770 ensures high volumes of RES-based generation, which range from 1,642 TWh to 2,002 TWh.

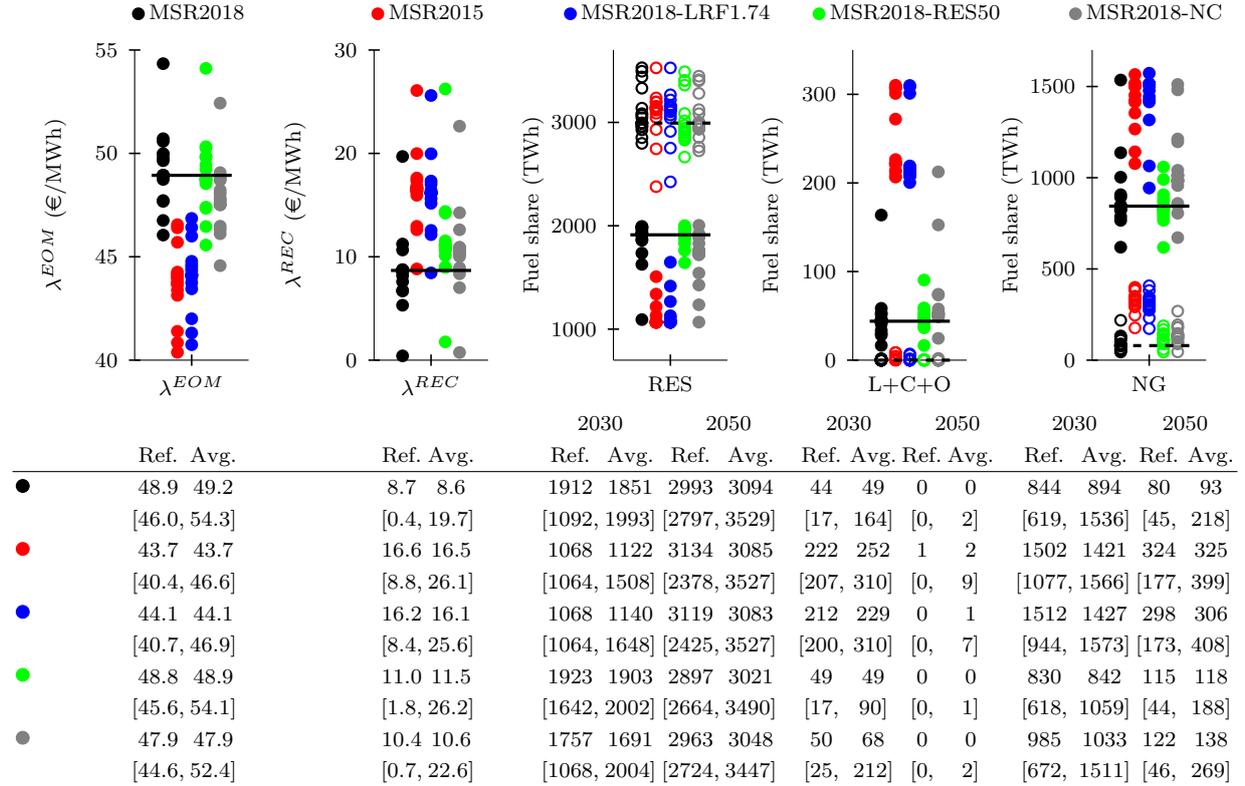


Figure 4. Share of lignite, coal and oil (L+C+O), natural gas (NG) and renewables (RES) in the power sector’s fuel mix in 2030 and 2050; average electricity prices  $\lambda_y^{EOM}$  over the model horizon and average value of REC ( $\lambda^{REC}$ ) over the period 2020-2030 in the different policy scenarios, as indicated by the colors of the markers. The solid markers indicate the fuel shares in 2030, whereas the white-filled markers correspond to those in 2050. The solid (2030) or dashed (2050) black line indicates the value in the reference scenario. The table below summarizes the results for the five selected indicators under reference assumptions (‘Ref.’), averaged across the seventeen results per policy scenario (‘Avg.’), the minimum and maximum value (intervals).

771 As expected, less electricity is generated from RES by 2030 in policy scenarios ‘MSR2015’  
 772 (1,122 TWh) and ‘MSR2018-LRF1.74’ (1,140 TWh).

773 Gas-fired electricity generation peaks between 2025 and 2030 in policy scenarios ‘MSR2018’,  
 774 ‘MSR2018-NC’ and ‘MSR2018-RES50’. In the last scenario, this peak is less pronounced,  
 775 with gas-fired generation accounting for 618 to 1,059 TWh in 2030, whereas in our reference  
 776 policy scenario, this ranges from 619 TWh to 1,536 TWh. In 2050, gas-fired generation is re-  
 777 duced to, on average, 93 TWh in the reference policy scenario. Similar volumes are observed  
 778 in policy scenarios ‘MSR2018-NC’ and ‘MSR2018-RES50’. In policy scenarios ‘MSR2018-  
 779 LRF1.74’ and ‘MSR2015’, gas-fired electricity generation remains above 300 TWh in 2050.

780 Remarkably, all policy scenarios are characterized by similar RES-based electricity gener-  
 781 ation volumes in 2050: on average, RES-based generation ranges from 3,021 TWh (‘RES2018-  
 782 RES50’) to 3,094 TWh (‘MSR2018’). This similar trend is triggered by the falling investment  
 783 costs for renewable electricity generation technologies and declining CO<sub>2</sub> emissions cap, re-  
 784 gardless of the MSR design, 2030 RES target or LRF.

785 Furthermore, within each policy scenario, the sensitivity analysis reveals significant vari-  
786 ations in fuel shares, electricity and REC prices depending on our assumptions w.r.t. key  
787 parameters. Four pronounced effects may be distinguished. First, the discount rate affects  
788 the EUA price (Section 5.2.1), which in turn affects electricity and REC prices, as well as  
789 the fuel shares in the electricity sector. High discount rates depress EUA prices in the short  
790 run, which in turn allows for higher shares of lignite-, coal-, gas- and oil-fired generation  
791 and less RES-based electricity generation up to 2030. The switch from lignite and coal to  
792 natural gas is delayed and less pronounced. In the long run, fuel shares are however typi-  
793 cally not significantly affected. Second, higher natural gas prices tolerate elevated lignite-  
794 and coal-fired generation in 2030, but also promote the uptake of renewables. Third, the  
795 reaction of the industry to EUA prices mostly impacts the abatement in the power sector on  
796 the short term. For example, in 2030, lower abatement costs, hence higher abatement rates,  
797 in the energy-intensive industry result in a higher share of CO<sub>2</sub>-intensive forms of electricity  
798 generation. In 2050, lower abatement in the energy-intensive industry triggers a displace-  
799 ment of new nuclear capacity by gas-fired capacity. Last, in policy scenarios characterized  
800 by low EUA prices (‘MSR2018-LRF1.74’ and ‘MSR2015’), the RES target in 2030 is binding  
801 in all scenarios, except those characterized by (1) high gas prices, (2) low discount rates or  
802 (3) accelerated decreases in investment costs of wind and solar power, which all promote  
803 RES-based generation.

### 804 5.3. Impact on total costs

805 To properly interpret these changes in, i.a., electricity, EUA and REC prices, one has  
806 to compare the overall change in total costs induced by changing policies. In this paper,  
807 we approximate changes in total cost by calculating the change in overall investment and  
808 operating costs required to meet the demand for electricity and policy targets:

$$TC = \sum_{y \in \mathcal{Y}} A_y^{SP} \cdot \left[ \sum_{p \in \mathcal{P}} \sum_{d \in \mathcal{D}} W_d \sum_{h \in \mathcal{H}} VC_p^C \cdot g_{y,d,h,p}^{C*} + \sum_{p \in \mathcal{P}} IC_p^C \cdot cp_{y,p}^{C*} + \sum_{r \in \mathcal{R}} IC_r^R \cdot cp_{y,r}^{R*} + \int_{e_y^{I*}}^{e_{2017}^I} \mathcal{F}^{-1}(e_y^I) \right] \quad (19)$$

809 in which we use an asterisk to indicate the values of the decision variables in the equilibrium.  
810 The first term  $\sum_{p \in \mathcal{P}} \sum_{d \in \mathcal{D}} W_d \sum_{h \in \mathcal{H}} VC_p^C \cdot g_{y,d,h,p}^{C*}$  corresponds to the estimated generation costs  
811 in the power system. The second and third term are the investment costs in conventional  
812  $\sum_{p \in \mathcal{P}} IC_p^C \cdot cp_{y,p}^{C*}$  and renewable generation capacity  $\sum_{r \in \mathcal{R}} IC_r^R \cdot cp_{y,r}^{R*}$ . The last term indicates  
813 the abatement cost in the energy-intensive industry, calculated as the integral under the  
814 marginal abatement cost curve:  $\int_{e_y^{I*}}^{e_{2017}^I} \mathcal{F}^{-1}(e_y^I)$ . Note that we do not account for the salvage  
815 value of generation capacity investments and that costs are discounted from a social planner  
816 perspective, i.e., using 3.5% as discount rate ( $A_y^{SP} = 1/(1 + 0.035)^{y-1}$ ).

817 In Fig. 5, we summarize the result of this calculation, by plotting the total cost of  
818 each policy scenario under different technology, demand and discount rate assumptions as  
819 a function of the cumulative CO<sub>2</sub> emissions over the period 2017-2061. In the discussion  
820 above, we extensively focused on the underlying drivers for the variations in the observed  
821 CO<sub>2</sub> emissions under the same and different policy designs, here visualized by the width of

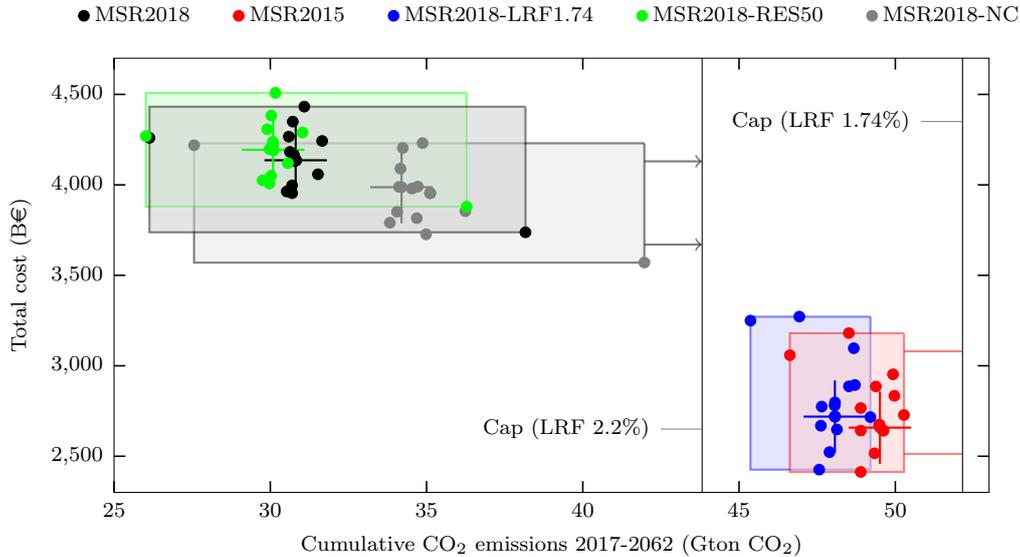


Figure 5. The total cost of a policy scenario, under different sets of assumptions, versus the cumulative CO<sub>2</sub> emissions over the period 2017-2061. The crosses indicate the total cost and cumulative emissions under reference assumptions, whereas the shaded areas indicate the range of costs and CO<sub>2</sub> emissions observed in the sensitivity analysis per policy scenario. The vertical lines indicate the cumulative cap, assuming a LRF of 1.74% or 2.2% as of 2021, including (i) backloaded and unallocated EUAs from the third phase of the EU ETS and (ii) the surplus at the end of 2016. Note that for policy scenarios ‘MSR2015’ and ‘MSR2018-NC’ the difference between the cap and the observed cumulative CO<sub>2</sub> emissions over the period 2017-2061 is still stored in the MSR at the end of 2061, whereas in the other policy scenarios, this volume is cancelled. The EUAs in the MSR at the end of 2061 will, in absence of a cancellation policy in policy scenarios ‘MSR2015’ and ‘MSR2018-NC’, result in CO<sub>2</sub> emissions in subsequent years, as indicated by the arrows.

822 the boxes. Note that current policies, compared to policy scenario ‘MSR2015’, lead to larger  
 823 variations in observed CO<sub>2</sub> emissions due to the cancellation policy and the self-reinforcing  
 824 feedback effect between marginal abatement costs and cancellation volumes (Bruninx et al.,  
 825 2019). In addition, recall that in policy scenarios without a cancellation policy, the difference  
 826 between the CO<sub>2</sub> emissions in the period 2017-2061 and the cap is stored in the MSR. In  
 827 theory, these allowances will be made available after 2061, hence, result in CO<sub>2</sub> emissions,  
 828 as indicated by the arrows in Fig. 5. In what follows, however, we focus on how total costs  
 829 differ within and between policy scenarios.

830 Considering the total cost under reference assumptions in each of the policy scenarios, the  
 831 following observations can be made. First, the total cost of the ‘MSR2018’ scenario amounts  
 832 to 4,136 B€, which is to be compared to 2,658 B€ in the ‘MSR2015’ policy scenario. The  
 833 difference in cost equals 1,477 B€. The cumulative CO<sub>2</sub> emissions are, however, 18,694  
 834 MtCO<sub>2</sub> (21,338 MtCO<sub>2</sub> compared to the cumulative cap in the ‘MSR2015’ scenario) higher  
 835 in the last case. The additional abatement caused by the strengthened MSR, the increased  
 836 LRF and 2030 RES target of 32%, hence, comes at a cost of 79.0 €/tCO<sub>2</sub> (69.2 €/tCO<sub>2</sub>  
 837 considering the cumulative cap in the ‘MSR2015’ scenario). Similar relative cost differences  
 838 (expressed in €/tCO<sub>2</sub>, considering CO<sub>2</sub> emissions in the period 2017-2061) are observed

839 between our reference policy scenario ‘MSR2015’ and policy scenarios ‘MSR2018-NC’ (83.2  
840 €/tCO<sub>2</sub>) and ‘MSR2018-RES50’ (73.1 €/tCO<sub>2</sub>). Note that average, relative abatement costs  
841 are higher for the less ambitious no-cancellation policy scenario. Considering that in policy  
842 scenarios ‘MSR2015’ and ‘MSR2018-NC’, the MSR is not depleted by the end of 2061 and  
843 that these EUAs will result in CO<sub>2</sub> emissions, relative abatement costs w.r.t. the cumulative  
844 cap in each scenario amount to 159.4 €/tCO<sub>2</sub>. Comparing policy scenario ‘MSR2015’ with  
845 policy scenario ‘MSR2018-LRF1.74’ reveals a relative total cost difference of 42.3 €/tCO<sub>2</sub> or  
846 14.9 €/tCO<sub>2</sub> if one considers the cumulative cap in policy scenario ‘MSR2015’. As discussed  
847 above, the strengthening the MSR without increasing the LRF leads to limited reductions  
848 in the available EUAs to the market (4.1 GtCO<sub>2</sub>), which can be offset by cheap investments  
849 in abatement measures.

850 The sensitivity analysis reveals that the variations in estimated total costs are similar in  
851 all policy scenarios: 629 B€ (‘MSR2018-RES50’) to 845 B€ (‘MSR2018-LRF1.74’). Rela-  
852 tive to the total cost under reference assumptions, policy scenarios ‘MSR2018’, ‘MSR2018-  
853 RES50’ and ‘MSR2018-NC’ show a variation in total cost of 15.0% to 16.8%, whereas for  
854 policy scenarios ‘MSR2015’ and ‘MSR2018-LRF1.74’ this relative difference may amount to  
855 31.1%. The drivers of high cost outcomes are, in order of importance, high demand growth,  
856 slow reduction in the investment cost of wind power, not allowing new nuclear power plants,  
857 low discount rates and high abatement costs in industry. High discount rates, low abatement  
858 costs in industry and accelerated wind power investment cost reductions lead to low total  
859 cost outcomes. These cost differences are in part driven by the direct impact of the change  
860 in parameters (e.g., higher investment costs for wind power results in higher total costs) and  
861 in part by the varying stringency of the cumulative cap (i.e., a smaller cumulative cap is  
862 more expensive to meet). In policy scenarios with a cancellation provision, the stringency  
863 of the cumulative cap is determined by the self-reinforcing feedback effect of today’s per-  
864 ception of future abatement costs on the cancellation volume. Indeed, as these parameters  
865 affect today’s perception of future abatement costs, they affect the profitability of banking  
866 allowances today, which in turn determines the surplus, absorbed and cancelled volume of  
867 allowances. This explains how discount rates affect the total cost of meeting the policy. In  
868 policy scenarios without a cancellation provision, a number of allowances may still be stored  
869 in the MSR at the end of our model horizon, limiting cumulative emissions in the period  
870 2019-2061.

## 871 6. Policy Implications

872 As in any model, assumptions and projections of uncertain input parameters, such as  
873 fuel prices, are required. Hence, our results should not be interpreted as a forecast of what  
874 energy, REC or EUA prices will be, but rather as a comparative, *what-if* analysis of several  
875 hypothetical policy scenarios. Such an analysis allows quantifying the order of magnitude  
876 of the impact of certain policy measures such as, e.g., the implementation of the MSR and  
877 the choice its design parameters. Below, we discuss the policy implications of our work.

878 The overall long-term trends in the power sector are driven by the decreasing greenhouse  
879 gas emissions cap, changes in fuel costs and falling investment costs for RES-based technolo-

880 gies, independent from the implementation of a (strengthened) MSR and an increase in the  
881 LRF. However, the 2018 legislative package has been shown to (1) accelerate the phase-out  
882 of coal and lignite and the adoption of natural gas as a transition fuel to renewables and  
883 (2) significantly reduce CO<sub>2</sub> emissions. The recently observed EUA price increase (Fig. 1)  
884 seems to indicate that the ETS reform has persuaded the energy-intensive industry and the  
885 power sector of the future scarcity of EUAs (Section 1). Note that this EUA price increase  
886 is exactly in line with our model results, i.e., an increase from 6.8 €/tCO<sub>2</sub> to 27.4 €/tCO<sub>2</sub>  
887 in 2019.

888 However, several critical remarks can be made on the current policy design. First, the  
889 impact of the MSR is highly dependent on other policies, such as the LRF or RES tar-  
890 gets, due to the self-reinforcing feedback effect between today's perception of current and  
891 future marginal abatement costs and the cancellation volume (Bruninx et al., 2019). This is  
892 most apparent in our 'MSR2018-LRF1.74' scenario, which illustrates that the strengthened  
893 MSR *alone* is expected to reduce emissions less than in a policy scenario with a LRF of  
894 2.2% *without* an MSR. Besides EU policy decisions, other evolutions, such as nuclear, coal  
895 and lignite phase-outs affect the impact of the MSR and the achieved CO<sub>2</sub> emission reduc-  
896 tions. Hence, the effective CO<sub>2</sub> emissions allowed under the ETS are no longer fixed, which  
897 may create uncertainty for investors in the power sector and energy-intensive industry and  
898 makes it impossible to set clear CO<sub>2</sub> emission reduction targets. In addition, the design  
899 of complementary climate policies, such as RES targets and support, becomes increasingly  
900 complicated, as one needs to account for the secondary effect on the effective cumulative CO<sub>2</sub>  
901 emissions cap in the ETS (Perino et al., 2019; Bruninx et al., 2019). Second, the decision  
902 to place back-loaded and unallocated EUAs in the MSR has no impact on the net supply of  
903 EUAs. Indeed, in all our results under policy scenario 'MSR2018', the volume of allowances  
904 cancelled in 2023 exceeds the volume of back-loaded and unallocated EUAs placed in the  
905 MSR, as banking of allowances (hence, high TNAC levels) persist well into the 2030's. One  
906 could wonder whether cancelling these back-loaded and unallocated allowances, i.e., explic-  
907 itly instead of implicitly tightening the emissions cap, would not provide a stronger signal  
908 to the sectors covered in the ETS. Last, the metric on which the actions of the MSR are  
909 based, i.e., the TNAC, is not in line with the effective surplus available to market partici-  
910 pants. Indeed, as aviation is currently excluded from the calculation of the TNAC and this  
911 sector buys EUAs to compensate for emissions above its annual cap, the effective surplus in  
912 the market is below the TNAC.<sup>10</sup> Considering the expected growth in CO<sub>2</sub> emissions from  
913 aviation, the difference between the TNAC and the effective surplus in the market is only  
914 expected to grow (Sandbag, 2017a).

915 In light of these challenges, one could wonder if explicitly strengthening the LRF (beyond  
916 the current increase from 1.74% to 2.2%) would not have provided a clearer message to  
917 energy-intensive industry and the power sector. Figure 6 shows the equivalent LRF as of  
918 2020 that allows the same cumulative CO<sub>2</sub> emissions over the period 2017-2061 in all policy

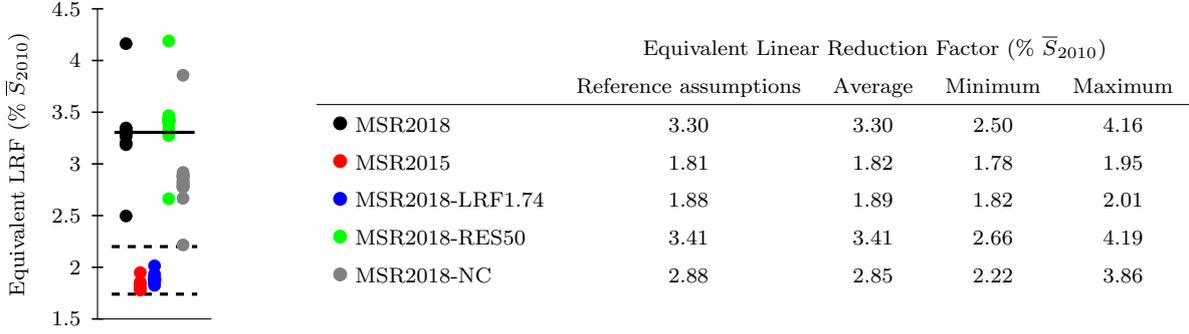


Figure 6. The equivalent LRF as of 2020 that allows the same cumulative CO<sub>2</sub> emissions over the period 2017-2061 in each of the policy scenarios, considering all parameter sets. Different colors represent the policy scenarios, whereas the solid black line indicates the equivalent LRF in policy scenario ‘MSR2018’ under reference assumptions. The dashed lines indicate the 1.74% and 2.2% LRF. The equivalent LRF is calculated via Eq. (20) in Footnote 23.

scenarios and across all parameter sets.<sup>23</sup> For example, in policy scenario ‘MSR2018’ under reference assumptions, the equivalent LRF equals 72.7 MtCO<sub>2</sub>/year or 3.3% of the 2010 emissions cap, assuming backloaded and unallocated allowances from Phase 3 are not made available to the market. Figure 6 once more illustrates the large uncertainty on the effective cumulative CO<sub>2</sub> emissions and the dependency of the effect of the current policy design on other evolutions in the power sector, energy-intensive industry and complementary climate policies. Enforcing these equivalent LRFs would, however, ensure that the tolerated CO<sub>2</sub> emissions would be known ex-ante and with certainty, without the need to introduce an MSR and a cancellation policy. Moreover, the design of complementary climate and energy policies, e.g., of individual member states, would not affect this cap, simplifying their design.

## 7. Conclusions & future work

In the recent past, the EU ETS failed to provide a sufficiently strong price signal to drive investments in carbon abatement. Therefore, Europe recently decided to strengthen the foreseen MSR and increase the LRF from 1.74% to 2.2%. This MSR will absorb (a part of) the excess of EUAs, in order to limit the oversupply of EUAs and increase their price. In addition, as of 2023, the amount of EUAs in the MSR is limited to the amount of EUAs auctioned in the previous year, implying cancellation of ‘excess’ allowances from the system.

<sup>23</sup>The required equivalent LRF, expressed in MtCO<sub>2</sub>, may be calculated using the following formula:

$$LRF = \frac{\bar{S}_{2020}^2}{2 \cdot \left[ \sum_{y=2017}^{2061} (e_y^I + e_y^{PS}) - \sum_{y=2017}^{2019} \bar{S}_y \right] - \bar{S}_{2020}} \quad (20)$$

in which  $\bar{S}_{2020}$  is the emissions cap in 2020, the sum  $\sum_{y=2017}^{2061} (e_y^I + e_y^{PS})$  represents the tolerated cumulative CO<sub>2</sub> emissions over the studied period and  $\sum_{y=2017}^{2019} \bar{S}_y$  is the cumulative supply of EUAs in the period 2017-2019, including the current surplus in the market.

936 The market’s reaction to, i.a., the foreseen implementation of this system led to a significant  
937 EUA price increase, as discussed in Section 1.

938 In this contribution, we put forward an extensive analysis of the long term impact of  
939 the introduction of the MSR on EUA prices, CO<sub>2</sub> emissions and investments in the power  
940 sector and industry. To this end, we develop a novel equilibrium model, representing the  
941 long-term interaction between the electric power sector, the energy-intensive industry, the  
942 energy-only electricity market and the EU ETS. This model is formulated as a large-scale  
943 MCP, with a focus on the electric power sector.

944 Comparing the results of simulations considering the design of the ETS before and after  
945 the 2018 reform, we observe a threefold increase in EUA prices from 6.8 €/tCO<sub>2</sub> to 27.4  
946 €/tCO<sub>2</sub> in 2019, in line with the actual EUA price increase observed in 2018 and 2019.  
947 Cumulative CO<sub>2</sub> emissions under the current policies may amount to 30.8 GtCO<sub>2</sub>, hence 41%  
948 or 21.3 GtCO<sub>2</sub> below the cumulative cap before the strengthening of the ETS (52.2 GtCO<sub>2</sub>).  
949 Around 40% of this decrease (8.3 GtCO<sub>2</sub>) is due to the increased linear reduction factor and  
950 60% due to the cancellation policy (13 GtCO<sub>2</sub>). The strengthened MSR and the increase  
951 in the LRF advance and amplify natural gas-coal fuel switching and RES investments in  
952 the power sector, as well as abatement in the energy-intensive industry. This results in an  
953 average increase of 5.3 €/MWh in average electricity prices and an average decrease of 7.9  
954 €/MWh in REC prices. We also find that these CO<sub>2</sub> emission reductions come at a cost of  
955 79 €/tCO<sub>2</sub>. A sensitivity analysis on our assumption on key parameters reveals, however,  
956 that the impact of the MSR on CO<sub>2</sub> emissions is strongly dependent on other policies, such  
957 as allowing new nuclear capacity or not, and the evolution of investment costs of, e.g., wind  
958 power. This dependency is driven by the self-reinforcing feedback effect that exists between  
959 today’s perception of current and future marginal abatement costs and the cancellation  
960 volume (Bruninx et al., 2019): policies that increase the marginal cost of future abatement  
961 provide an incentive for banking today, hence increase the surplus allowances, the volume  
962 of allowances absorbed and, ultimately, cancelled by the MSR. Cumulative emissions in the  
963 period 2017-2061 vary between 26.1 GtCO<sub>2</sub> and 38.2 GtCO<sub>2</sub>, which is to be compared with  
964 the cumulative cap of 43.8 GtCO<sub>2</sub> (LRF 2.2%) or 52.2 GtCO<sub>2</sub> (LRF 1.74%). Studying  
965 various policy scenarios (i.e., the current design of the MSR, complemented with (i) a LRF  
966 of 1.74% post 2020, (ii) a 50% RES target in the power sector in 2030 or (iii) without  
967 the cancellation provision) shows that it is the combination of the increase in LRF and  
968 cancellation provision of the MSR which drives the results. Indeed, with a LRF of 1.74% ,  
969 the MSR’s cancellation policy would decrease emissions by 2.9 to 6.8 GtCO<sub>2</sub> compared to  
970 the cumulative cap (52.2 GtCO<sub>2</sub>).

971 The dependency of the impact of the MSR on CO<sub>2</sub> emissions on other, complementary  
972 climate and energy policies, as well as on developments in the power sector, complicates  
973 setting specific CO<sub>2</sub> emission reduction targets and the design of the aforementioned com-  
974plementary climate policies, such as RES targets and support. The ETS without MSR,  
975 but with a more stringent LRF, is less prone to such issues. As discussed in Section 6, the  
976 equivalent LRF post-2020 to reach the same cumulative CO<sub>2</sub> emissions as under our refer-  
977ence assumptions in policy scenario ‘MSR2018’ *without* an MSR equals 72.7 MtCO<sub>2</sub>/year  
978 or 3.3% of the 2010 emissions cap.

979 Future work may entail the inclusion of more detail in the operating costs and constraints  
980 in the power sector, enhancing the temporal and geographical resolution of the model and the  
981 abatement options in the energy-intensive industry. In the same vein, explicitly considering  
982 (1) the adoption of technologies such as electric vehicles, power-to-X and heat pumps or  
983 (2) the relation between abatement and electrification in the energy-intensive industry may  
984 further strengthen our analysis. Relaxing our assumptions of rationality (e.g., introducing  
985 myopia), free entry and perfect competition may lead to additional insights.

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## 1120 Appendix A. ADMM: implementation & performance

1121 The ADMM-based algorithm, summarized in the pseudo code below, will try to find  
 1122 the equilibrium based on a form of a ‘tâtonnement’, ‘trial and error’ or price adjustment  
 1123 procedure (Höschle, 2018). In each iteration, each agent receives the price of EUAs, RECs  
 1124 and electricity at each time step. Based on this information, each agent optimizes its invest-  
 1125 ment and operating decisions. These decisions in turn affect market prices. By repeating  
 1126 this process, we attempt to determine the equilibrium prices at which none of the agents  
 1127 has an incentive to change its investment and operating decisions. As stated by Höschle  
 1128 (2018), there is no guarantee that the equilibrium found is unique. However, if the process  
 1129 converges, none of the agents has an incentive to deviate from its strategy and the market  
 1130 clearing conditions are satisfied.

Set  $\lambda_{y,d,h}^{\text{EOM},1}, \lambda_y^{\text{REC},1}, \lambda_y^{\text{ETS},1} = 0, R^{\text{EOM},1}, R^{\text{ETS},1}, R^{\text{REC},1}, R^{\text{C},1}, R^{\text{R},1}, R^{\text{I},1} = 2 \cdot \epsilon, i = 1$

**while**  $R^{\text{EOM},i} + R^{\text{ETS},i} + R^{\text{REC},i} \geq \epsilon$  or  $R^{\text{C},i} + R^{\text{R},i} + R^{\text{I},i} \geq \epsilon$  **do**

(1) Solve agents problems, based on  $\lambda_{y,d,h}^{\text{EOM},i}, \lambda_y^{\text{REC},i}, \lambda_y^{\text{ETS},i}$ :

$g_{y,d,h,p}^{\text{C},i}, b_{y,p}^{\text{C},i} = \text{argmin}((\text{A.1}) \text{ s.t. } (4) - (6))$

$g_{y,d,h,r}^{\text{R},i}, g_{y,r}^{\text{R,NB},i} = \text{argmin}((\text{A.2}) \text{ s.t. } (8) - (10))$

$b_y^{\text{I},i} = \text{argmin}((\text{A.3}) \text{ s.t. } (12) - (14))$

(2) Update supply of allowances, considering MSR actions in each year  $y$   
 according to Algorithm 2

(3) Update residuals:  $R^{\text{EOM},i+1}, R^{\text{ETS},i+1}, R^{\text{REC},i+1}, R^{\text{C},i+1}, R^{\text{R},i+1}, R^{\text{I},i+1}$   
 according to Eq. (A.4)-(A.9)

(4) Update prices:  $\lambda_{y,d,h}^{\text{EOM},i+1}, \lambda_y^{\text{REC},i+1}, \lambda_y^{\text{ETS},i+1}$  according to Eq. (A.10)- (A.12)

$i = i + 1$

**end**

**Algorithm 1:** Pseudo-code of the ADMM algorithm used to find the equilibrium between conventional generating companies, renewable generating companies and the energy-intensive industry under the EU ETS, based on Höschle (2018).

1132 In each step, we first update the agents decisions, based on the remaining imbalances,  
 1133 decisions in the previous iteration and the current prices  $\lambda_{y,d,h}^{\text{EOM},i}, \lambda_y^{\text{REC},i}$  and  $\lambda_y^{\text{ETS},i}$ . Second,  
 1134 we update the net supply of allowances according to the MSR actions, based on the estimated  
 1135 emissions in this iteration (Algorithm 2). Third, the primal residuals  $R^{\text{EOM},i}, R^{\text{REC},i}$  and  
 1136  $R^{\text{ETS},i}$  and the dual residuals  $R^{\text{C},i}, R^{\text{R},i}$  and  $R^{\text{I},i}$  are calculated (Eq. (A.4)-(A.9)). Last, prices  
 1137 are updated, depending on the remaining imbalances on the market clearing conditions (Eq.  
 1138 (A.10) – (A.12)). This process is repeated until the primal and dual residuals satisfy a  
 1139 predefined stopping criterion  $\epsilon$ , which is defined as  $\delta \sqrt{(N^{\text{C}} + N^{\text{R}} + 1 + 1) \cdot N^{\text{Y}} \cdot N^{\text{D}} \cdot N^{\text{H}}}$ ,  
 1140 following Höschle (2018).  $\delta$  is the tolerance, set to  $10^{-2}$  in all simulations.

1141 *Appendix A.1. Step (1): Solve agents problems, based on  $\lambda_{y,d,h}^{\text{EOM},i}$ ,  $\lambda_y^{\text{REC},i}$ ,  $\lambda_y^{\text{ETS},i}$*

1142 In order to limit the change in the strategy of the agents from one iteration to the  
 1143 next, the objective of the optimization problems (3)-(6), (7)-(10) and (11)-(14) are recast  
 1144 as minimization problems and complemented with a penalty term for each of their decision  
 1145 variables that appear in a market clearing condition. With superscript  $i$  indicating the  
 1146 current iteration, objectives (3), (7) and (11) are replaced by:

$$\begin{aligned} \text{Min.} \quad & - \sum_{y \in \mathcal{Y}} A_y \cdot \left[ \sum_{d \in \mathcal{D}} W_d \cdot \sum_{h \in \mathcal{H}} (\lambda_{y,d,h}^{\text{EOM},i} - V C_p^C) g_{y,d,h,p}^{C,i} - (1 - S V_{y,p}^C) \cdot I C_p^C \cdot c p_{y,p}^{C,i} - \lambda_y^{\text{ETS},i} \cdot b_{y,p}^{C,i} \right] \quad (\text{A.1}) \\ & + \frac{\rho}{2} \cdot \sum_{y \in \mathcal{Y}} A_y \cdot \sum_{d \in \mathcal{D}} W_d \cdot \sum_{h \in \mathcal{H}} \left[ g_{y,d,h,p}^{C,i} - g_{y,d,h,p}^{C,i-1} + \frac{1}{N^{\text{EOM}}} \left( \sum_{p \in \mathcal{P}} g_{y,d,h,p}^{C,i-1} + \sum_{r \in \mathcal{R}} g_{y,d,h,r}^{R,i-1} - D_{y,d,h} \right) \right]^2 \\ & + \frac{\rho}{2} \cdot \sum_{y \in \mathcal{Y}} A_y \cdot \left[ b_{y,p}^{C,i} - b_{y,p}^{C,i-1} + \frac{1}{N^{\text{ETS}}} \left( S_y^i - \sum_{p \in \mathcal{P}} b_{y,p}^{C,i-1} - b_y^{I,i-1} \right) \right]^2 \end{aligned}$$

$$\begin{aligned} \text{Min.} \quad & - \sum_{y \in \mathcal{Y}} A_y \cdot \left[ \sum_{d \in \mathcal{D}} W_d \cdot \sum_{h \in \mathcal{H}} \lambda_{y,d,h}^{\text{EOM}} \cdot g_{y,d,h,r}^{R,i} + \lambda_y^{\text{REC},i} \cdot g_{y,r}^{R,\text{NB},i} - (1 - S V_{y,r}^R) \cdot I C_r^R \cdot c p_{y,r}^{R,i} \right] \quad (\text{A.2}) \\ & + \frac{\rho}{2} \cdot \sum_{y \in \mathcal{Y}} A_y \cdot \sum_{d \in \mathcal{D}} W_d \cdot \sum_{h \in \mathcal{H}} \left[ g_{y,d,h,p}^{R,i} - g_{y,d,h,r}^{R,i-1} + \frac{1}{N^{\text{EOM}}} \left( \sum_{p \in \mathcal{P}} g_{y,d,h,p}^{C,i-1} + \sum_{r \in \mathcal{R}} g_{y,d,h,r}^{R,i-1} - D_{y,d,h} \right) \right]^2 \\ & + \frac{\rho}{2} \cdot \sum_{y \in \mathcal{Y} \setminus \{RT_y > 0\}} A_y \cdot \left[ g_{y,r}^{R,\text{NB},i} - g_{y,r}^{R,\text{NB},i-1} + \frac{1}{N^R + 1} \left( \sum_{r \in \mathcal{R}} g_{y,r}^{R,\text{NB},i-1} - RT_y \right) \right]^2 \end{aligned}$$

$$\text{Min.} \quad \sum_{y \in \mathcal{Y}} A_y \cdot \lambda_y^{\text{ETS},i} \cdot b_y^{I,i} + \frac{\rho}{2} \cdot \sum_{y \in \mathcal{Y}} A_y \cdot \left[ b_y^{I,i} - b_y^{I,i-1} + \frac{1}{N^{\text{ETS}}} \left( S_y^i - \sum_{p \in \mathcal{P}} b_{y,p}^{C,i-1} - b_y^{I,i-1} \right) \right]^2 \quad (\text{A.3})$$

1147  $N^{\text{EOM}}$  is the number of participants in the energy-only market ( $N^{\text{EOM}} = N^P + N^R + 1$ ).  
 1148 Similarly,  $N^{\text{ETS}}$  is the number of participants in the ETS system ( $N^{\text{ETS}} = N^P + 2$ ).

1149 Note that the penalty terms reduce to zero when (i) the agent does not deviate from its  
 1150 strategy in the previous iteration (e.g.,  $g_{y,d,h,p}^{C,i} = g_{y,d,h,p}^{C,i-1}$ ) and (ii) the residual imbalance on  
 1151 the market reduces to zero (e.g.,  $\sum_{p \in \mathcal{P}} g_{y,d,h,p}^{C,i-1} + \sum_{r \in \mathcal{R}} g_{y,d,h,r}^{R,i-1} - D_{y,d,h} = 0$ ). In other words,  
 1152 the penalty terms reduce to zero if an equilibrium is reached.

1153 *Appendix A.2. Step (2) Update supply of allowances, considering MSR actions*

1154 Given the emissions in the current iteration, one may calculate the TNAC at the end of  
 1155 each year. Given this metric for the surplus, the actions of the MSR (i.e., intake, outflow  
 1156 and/or cancellation) may be obtained, following the rules governing the MSR (Table 2).  
 1157 The different steps of this procedure are summarized in Algorithm 2.

Set  $y = 2017$

**while**  $y \in \mathcal{Y}$  **do**

Set  $m = 1$

**while**  $m \in \mathcal{M}$  **do**

$$x_{y,m}^{\text{MSR},i} = \begin{cases} \overline{x_y^{\text{MSR}}} \cdot \text{tnac}_{y-2}^i, & \text{if } \text{tnac}_{y-2}^i \geq \overline{\text{TNAC}} \ \& \ m \in \{1, \dots, 8\} \ \& \ y \geq 2019 \\ \overline{x_y^{\text{MSR}}}, & \text{if } \text{tnac}_{y-2}^i \leq \overline{\text{TNAC}} \ \& \ m \in \{1, \dots, 8\} \ \& \ y \geq 2019 \\ \overline{x_y^{\text{MSR}}} \cdot \text{tnac}_{y-1}^i, & \text{if } \text{tnac}_{y-1}^i \geq \overline{\text{TNAC}} \ \& \ m \in \{9, \dots, 12\} \ \& \ y \geq 2019 \\ \overline{x_y^{\text{MSR}}}, & \text{if } \text{tnac}_{y-1}^i \leq \overline{\text{TNAC}} \ \& \ m \in \{9, \dots, 12\} \ \& \ y \geq 2019 \\ 0, & \text{otherwise} \end{cases}$$

$$c_{y,m}^{\text{MSR},i} = \begin{cases} 0.57 \cdot \overline{S_{y-1}} - \text{msr}_{y,m-1}^i - x_{y,m}^{\text{MSR},i}, & \\ \text{if } \text{msr}_{y,m-1}^i + x_{y,m}^{\text{MSR},i} \geq 0.57 \cdot \overline{S_{y-1}} \ \& \ m \geq 2 \ \& \ y \geq 2024 \\ 0.57 \cdot \overline{S_{y-1}} - \text{msr}_{y,m-1}^i - x_{y,m}^{\text{MSR},i} - \delta_y, & \\ \text{if } \text{msr}_{y,m-1}^i + x_{y,m}^{\text{MSR},i} + \delta_y \geq 0.57 \cdot \overline{S_{y-1}} \ \& \ m=1 \ \& \ y \geq 2024 \\ 0, & \text{otherwise} \end{cases}$$

$$\text{msr}_{y,m}^i = \begin{cases} \text{msr}_{y,m-1}^i + x_{y,m}^{\text{MSR},i} - c_{y,m}^{\text{MSR},i} & \text{if } m \geq 2 \\ \text{msr}_{y-1,m}^i + x_{y,m}^{\text{MSR},i} - c_{y,m}^{\text{MSR},i} + \delta_y & \text{if } m = 1 \end{cases}$$

$m = m+1$

**end**

$$\text{tnac}_y^i = \sum_{y^*=1}^y \left[ \overline{S_{y^*}} + \delta_{y^*} - \sum_{d \in \mathcal{D}} W_d \cdot \sum_{h \in \mathcal{H}_{p \in \mathcal{P}}} C I_p^C \cdot g_{y^*,d,h,p}^{C,i} - e_{y^*}^{I,i} - \sum_{m \in \mathcal{M}} c_{y^*,m}^{\text{MSR},i} - \text{msr}_{y,12}^i \right]$$

$$S_y^{i+1} = \overline{S_y} - \sum_{m \in \mathcal{M}} x_{y,m}^{\text{MSR},i}$$

$y = y + 1$

**end**

**Algorithm 2:** Pseudo-code describing the functioning of the MSR. Superscript  $i$  refers to the iteration of the ADMM algorithm.

1159 *Appendix A.3. Step (3): Update primal & dual residuals*

1160 The primal residuals  $R^{\text{EOM},i}$ ,  $R^{\text{REC},i}$  and  $R^{\text{ETS},i}$ , i.e, the imbalances on the market clearing  
 1161 conditions, and the dual residuals  $R^{C,i}$ ,  $R^{\text{R},i}$  and  $R^{\text{I},i}$ , as a measure of the change in the value  
 1162 of the decision variables from one iteration to the next, are calculated following Höschle  
 1163 (2018). Note that the primal ETS imbalance is governed by (i) the imbalance between  
 1164 demand and supply in each year and (ii) the difference between in supply of allowances  
 1165 between iterations due to the MSR actions.

$$R^{\text{EOM},i+1} = \sqrt{\sum_{y \in \mathcal{Y}} \sum_{d \in \mathcal{D}} \sum_{h \in \mathcal{H}} \left[ \sum_{p \in \mathcal{P}} g_{y,d,h,p}^{\text{C},i} + \sum_{r \in \mathcal{R}} g_{y,d,h,r}^{\text{R},i} - D_{y,d,h} \right]^2} \quad (\text{A.4})$$

$$R^{\text{ETS},i+1} = \sqrt{\sum_{y \in \mathcal{Y}} \left[ S_y^i - \sum_{p \in \mathcal{P}} b_{y,p}^{\text{C},i} - b_y^{\text{I},i} \right]^2} + \sqrt{\sum_{y \in \mathcal{Y}} \left[ S_y^{i+1} - S_y^i \right]^2} \quad (\text{A.5})$$

$$R^{\text{REC},i+1} = \sqrt{\sum_{y \in \mathcal{Y} \setminus \{RT_y > 0\}} \left[ \sum_{r \in \mathcal{R}} g_{y,r}^{\text{R,NB},i} - RT_y \right]^2} \quad (\text{A.6})$$

$$R_p^{\text{C},i} = \rho \cdot \sqrt{\sum_{y \in \mathcal{Y}} \left[ (b_{y,p}^{\text{C},i} - \chi_y^{\text{ETS},i}) - (b_{y,p}^{\text{C},i-1} - \chi_y^{\text{ETS},i-1}) \right]^2} \quad (\text{A.7})$$

$$+ \rho \cdot \sqrt{\sum_{y \in \mathcal{Y}} \sum_{d \in \mathcal{D}} \sum_{h \in \mathcal{H}} \left[ (g_{y,d,h,p}^{\text{C},i} - \chi_{y,d,h}^{\text{EOM},i}) - (g_{y,d,h,p}^{\text{C},i-1} - \chi_{y,d,h}^{\text{EOM},i-1}) \right]^2}$$

$$\text{with } \chi_y^{\text{ETS},i} = \frac{1}{N_{\text{ETS}}} \left( \sum_{p \in \mathcal{P}} b_{y,p}^{\text{C},i} + b_y^{\text{I},i} \right) \text{ and } \chi_{y,d,h}^{\text{EOM},i} = \frac{1}{N_{\text{EOM}}} \left( \sum_{p \in \mathcal{P}} g_{y,d,h,p}^{\text{C},i} + \sum_{r \in \mathcal{R}} g_{y,d,h,r}^{\text{R},i} \right)$$

$$R_r^{\text{R},i+1} = \rho \cdot \sqrt{\sum_{y \in \mathcal{Y} \setminus \{RT_y > 0\}} \left[ (g_{y,r}^{\text{R,NB},i} - \chi_y^{\text{REC},i}) - (g_{y,r}^{\text{R,NB},i-1} - \chi_y^{\text{REC},i-1}) \right]^2} \quad (\text{A.8})$$

$$+ \rho \cdot \sqrt{\sum_{y \in \mathcal{Y}} \sum_{d \in \mathcal{D}} \sum_{h \in \mathcal{H}} \left[ (g_{y,d,h,r}^{\text{R},i} - \chi_{y,d,h}^{\text{EOM},i}) - (g_{y,d,h,r}^{\text{R},i-1} - \chi_{y,d,h}^{\text{EOM},i-1}) \right]^2}$$

$$\text{with } \chi_y^{\text{REC},i} = \frac{1}{NR + 1} \sum_{r \in \mathcal{R}} g_{y,r}^{\text{R,NB},i}$$

$$R_y^{\text{I},i+1} = \rho \cdot \sqrt{\sum_{y \in \mathcal{Y}} \left[ (b_y^{\text{I},i} - \chi_y^{\text{ETS},i}) - (b_y^{\text{I},i-1} - \chi_y^{\text{ETS},i-1}) \right]^2} \quad (\text{A.9})$$

1166 *Appendix A.4. Step (4): Update prices*

1167 For the energy only market, the price update reads, with  $\rho$  a parameter controlling the  
1168 ‘step size’ of the update:

$$\forall y \in \mathcal{Y}, \forall d \in \mathcal{D}, \forall h \in \mathcal{H} : \lambda_{y,d,h}^{\text{EOM},i+1} = \lambda_{y,d,h}^{\text{EOM},i} - \rho \cdot \left( \sum_{p \in \mathcal{P}} g_{y,d,h,p}^{\text{C},i} + \sum_{r \in \mathcal{R}} g_{y,d,h,r}^{\text{R},i} - D_{y,d,h} \right) \quad (\text{A.10})$$

We define the following price update strategy for EUAs:

$$\forall y \in \mathcal{Y} : \lambda_y^{\text{ETS},i+1} = \lambda_y^{\text{ETS},i} - \frac{\rho}{8760} (S_y^{i+1} - \sum_{p \in \mathcal{P}} b_{y,p}^{\text{C},i} - b_y^{\text{I},i}), \quad (\text{A.11})$$

1169  $S_y^{i+1}$  is the net supply of allowances, corrected for the MSR actions (see above). Since the  
1170 imbalances is calculated on an annual basis, we apply a scale factor of  $8760^{-1}$  to avoid overly  
1171 aggressive price updates.

The REC price updates are calculated as follows, given RES target  $RT_y$  in year  $y$ :

$$\forall y \in \mathcal{Y} : \lambda_y^{\text{REC},i+1} = \lambda_y^{\text{REC},i} - \frac{\rho}{8760 \cdot RT_y^{\text{rel}}} \left( \sum_{r \in \mathcal{R}} \sum_{d \in \mathcal{D}} W_d \sum_{h \in \mathcal{H}} g_{y,d,h,r}^{\text{R}} - RT_y \right), \quad (\text{A.12})$$

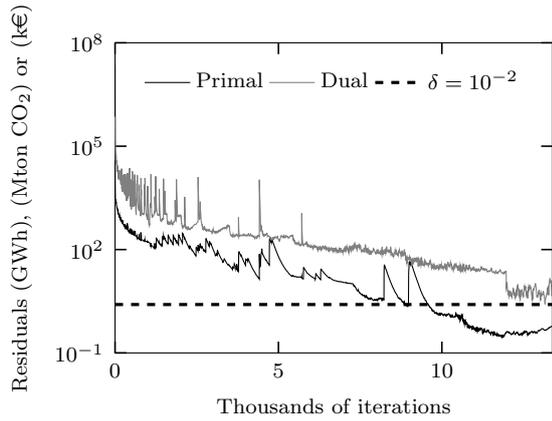
1172 Only newly build capacity ( $g_{y,r}^{\text{R,NB},i}$ ) receives these REC (Eq. (7)), however, the contribution  
 1173 of currently installed capacity in meeting the target is considered (Eq. (A.12)). Note the  
 1174 scaling factor  $(8760 \cdot RT_y^{\text{rel}})^{-1}$ , with  $RT_y^{\text{rel}}$  the relative RES target (e.g., 0.32) in year  $y$ , to  
 1175 keep all price updates in the same order of magnitude.

#### 1176 *Appendix A.5. Illustration of convergence*

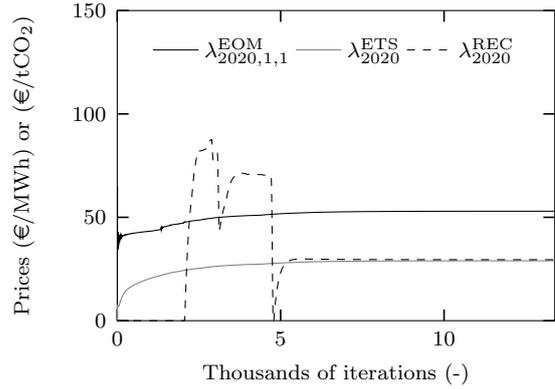
1177 Although ADMM-based methods are known for their good convergence properties (Höschle  
 1178 et al., 2017), obtaining an equilibrium may require solving several thousands of optimization  
 1179 problems, and hence entail a significant computational cost. To some extent, this process  
 1180 may be accelerated by tuning parameter  $\rho$ , which governs the price update and the penalty  
 1181 factor in the agents' objectives (Höschle, 2018; Boyd et al., 2011). In this particular setting,  
 1182 we observed the best trade-off between aggressive price updates and convergence by set-  
 1183 ting  $\rho$  to 1.1 €/MWh and 1.1 €/ton CO<sub>2</sub>. We did not explore iteration or market-specific  
 1184  $\rho$ -values (Boyd et al., 2011) to speed up the convergence of the algorithm. To enhance  
 1185 the computational performance, we scale all emission-related variables to MtCO<sub>2</sub> and all  
 1186 electricity related variables to GWh. In our sensitivity analysis, we use the result under  
 1187 reference assumptions as a starting solution to warm-start the algorithm. This approach  
 1188 ensures that deviations from this result are meaningful, i.e., that the equilibrium under  
 1189 reference assumptions is not an equilibrium in the sensitivity analysis.

1190 Below, we illustrate the convergence of the ADMM algorithm in policy scenario ‘MSR2018’  
 1191 under reference assumptions (Fig. A.7). Primal residuals related to the energy-only market  
 1192 and the RES-target are calculated on a per GWh-basis, whereas the primal residual in the  
 1193 ETS are expressed in MtCO<sub>2</sub>. Dual imbalances are all expressed in thousands of € (k€).

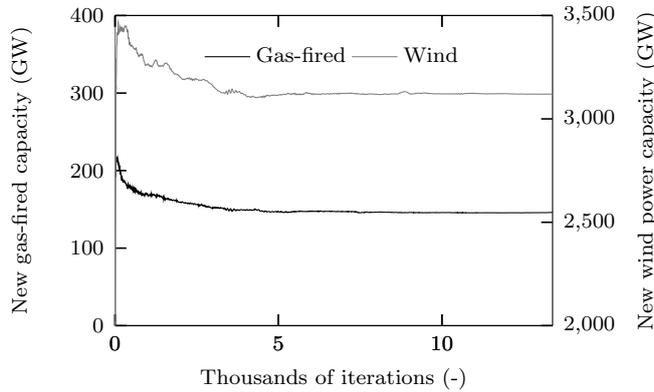
1194 To reach the predefined tolerance with  $\delta = 10^{-2}$ , approximately 13,387 iterations are  
 1195 required in this specific case. The primal residuals meet the stopping criterion sooner, i.e.,  
 1196 after 9,577 iterations. Around the same number of iterations, the decision variables of the  
 1197 individual agents and the commodity prices converge to their equilibrium value, as illustrated  
 1198 for the electricity price, REC and ETS price in 2020 (Fig. A.7b), the cumulative investments  
 1199 in gas-fired and wind-based generation capacity (Fig. A.7c) and fuel shares of gas-fired and  
 1200 wind-based electricity generation in 2030 (Fig. A.7d).



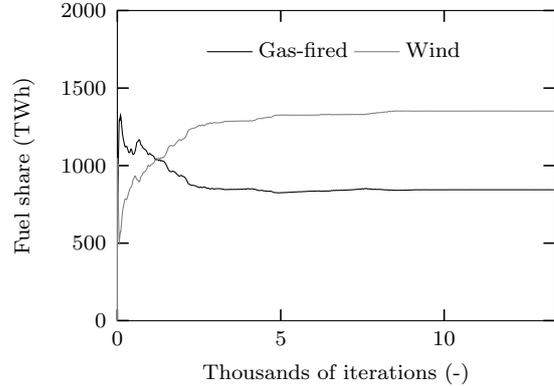
(a) Residuals



(b) Electricity, REC and ETS price in 2020



(c) Cumulative investment in new wind power or gas-fired power plant capacity in 2018-2061.



(d) Fuel share of wind-based or gas-fired electricity generation in 2030

Figure A.7. Convergence of the ADMM algorithm, as illustrated by the evolution of the primal and dual residuals (Fig. A.7a), the electricity, REC and ETS prices in 2020 (Fig. A.7b), the cumulative investment in new gas-fired generation and wind power plants (Fig. A.7c) and the fuel share of these technologies in 2030 (Fig. A.7d) in policy scenario ‘MSR2018’ under reference assumptions.