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Preparing the 2021 EU ETS MSR Review and the Road to Greater EU Climate Ambition

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Introduction	Model 000		
This paper			

- Evaluate options for 2021 review with focus on raising ambition
- Raising ambition is at the core of current policy debate
 - national level: implement demand-reducing or cancellation policies, price floor
 - EU level: reinforce companion or non-ETS sector policies, ETS review
 - Parry (2019, EER): \uparrow EUA prices create larger welfare gains (Pareto improv)
- ETS review: changes in LRF & MSR (rate, thresholds, cancellation)
 - these elements interact + hinge on firms' behavior (horizon, responsiveness)
 - (model: other policies embedded in yearly revised EUA demand forecasts)
- Plug & play analysis based on: Emissions Trading with Rolling Horizons
 - competitive intertemporal ETS model under uncertainty with supply control
 - firms can utilize rolling horizon and have bounded responsiveness to control
 - RH reconciles 2008-17 bank dynamics w/ implicit discount rates (better on price)
 - perform detailed analysis of 2018 EU ETS reform

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Modeling framework

- Usual intertemporal ETS model in discrete time t = 1, 2, ... with \bigcirc more
 - stochastic future baseline emissions (Borenstein et al., 2019)
 - representative firm approach (Rubin, 1996; Cantillon & Slechten, 2018)
 - unlimited banking, limited borrowing (non-linearity à la Deaton & Laroque)
 - minimize expected NPV of costs & quasi Hotelling's rule $p_t \beta \mathbb{E}_t \{p_{t+1}\} \ge 0$
- Supply-side control via MSR: supply schedule is endogenized
- Representative firm utilizes infinite or rolling horizon (Goldman, 1968)
 - RH: optimize over *h* years given realistic supply and demand forecasts + only implements date-*t* optimal outputs and moves to *t* + 1 with updated forecasts
- Key quantity for firm: expected cumulative abatement effort over horizon \rightarrow interplay between decisions in equilibrium and MSR actions over time
 - $\bullet\,$ zero responsiveness: firm discovers MSR impacts each year w/o anticipation
 - full responsiveness: firm perfectly perceives and accounts for interplay
 → implement fixed-point approach in spirit of Lucas & Prescott (1971)

	Model			
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Calibration				

- Rich variety of observed trading and compliance behaviors received
 - autarkic compliance via banking & borrowing, active non-compliance entities
 - difficult to elicit firms' degree of and horizon for intertemporal optimization
 - various risk and managerial preferences to handle compliance and trading
 - rolling horizons are a reality (std mgt process, fut maturities, reg uncertainty)
- \blacksquare Lack of conclusive evidence \rightarrow Friedman's black box type of approach
 - infinite vs rolling horizons in how well they replicate 2008-17 outcomes
 - calibrate resultant of all firms' behaviors with usual representative firm model
- Two-step calibration in spirit of standard least squares MLE more
 - parametrize historical and forecasted supply and demand conditions
 - infinite: $h = \infty^* r = 7.06\%$ vs rolling: h = 12y and $r = 3\%^*$
 - RH reconciles bank dynamics with implicit discount rates (+better on price)
 - ▶ $r \approx 7\%$ in line with general returns on risky assets (Jordà et al., 2019)
 - $r \approx 3\%$ central value for rates implied from futures' yield curves

Model		
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Infinite vs rolling horizons (in status quo)



- Case with cancellation mechanism and full responsiveness of firms
 - reform impacts depend on firms' behavior (horizon and responsiveness)
 - 2018 price jump partly recovered by a rolling horizon
 - cumulative cancellations: 5 (infinite) vs 10 (rolling) $GtCO_2$
 - in WP: decompose impacts of (interaction between) LRF \uparrow , MSR, cancellation

	Review		
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Preparing and informing the 2021 review process

- From now on: assume firms use RH and exhibit full responsiveness
- Review elements include changes in
 - cap linear reduction factor (LRF)
 - MSR intake rate (and fixed re-injection quantity)
 - MSR thresholds' positions (height, width) and slopes
- Cancellation mechanism taken as granted though need be enshrined
 - small impacts with RH: re-injections are far off, mostly outside horizon
- Evaluate changes in isolation: combinations are likely but numerous
- Focus on MSR-induced resilience to future shocks (2nd reform objective)
- Assume that agreement on review takes time (as for 2015-18 reform)
 - regulatory changes are implemented in 2024 and maintained thereafter
 - $\bullet\,$ voted/agreed upon in and thus anticipated from 2023

	Review		
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Changing the intake rate



- A higher intake rate magnifies threshold effects of a trigger mechanism
 - does not bring stability to market: conditions harder to gauge for participants
 - interacts with banking motives: drag vs restoring force around upper threshold
 - prices slightly higher on average, but more volatile
 - slightly larger cumulative cancellations: 8.71 (12%) to 9.15 (48%) GtCO₂

	Review	
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Changing the intake rate

Annual MSR intakes with different intake rates



- Cumulative MSR intakes are similar but time profiles vary:
 - low rate: annual intakes quite stable over time
 - high rate: annual intakes more erratic (roller coaster) + shorter intake period

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Changing the height of the thresholds



- Higher thresholds imply lower prices and smaller cumulative removals
 - height of upper threshold matters the most with cancellation mechanism
 - if one seeks to curtail TNAC, implement high thresholds!
 - prices ordered by decreasing upper threshold height (range of 5-10€/tCO₂)
 - cumulative cancellations can vary more: 6.86 (1233) to 9.26 (433) GtCO₂

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Changing the width between the thresholds



- SIMILAR STORY: position of upper threshold matters the most
 - similar ordering of price and banking paths (less visible)
 - cumulative cancellations vary less: 8.04 (1033) to 8.85 (733) GtCO₂

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Declining thresholds



- Declining thresholds stabilize impacts of higher intake rates
 - accompany the natural (bell-shaped) trajectory of the bank
 - TNAC never falls within the desired range but is 'stabilized'
 - relative to constant thresholds (and fixed re-injection quantity):
 - prices are higher and less volatile for all intake rates
 - cumulative cancellations are larger: 9.27 (12%) to 11.1 (48%) GtCO₂

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Declining thresholds

Annual MSR intakes with different intake rates and declining thresholds



Annual MSR intakes quite stable over time (except for 48% at first)

• similar in size across intake rates: higher rate compensated by lower bank

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MSR-induced resilience to future 'imbalances'?

Unanticipated permanent negative demand shock (-150MtCO₂ from 2025)



Shock not entirely cushioned + price not 'put back on track'

- price response and shock absorption not monotonic in the intake rate
 - price drop maximal with 12% (5.6€) minimal with 30% (3.2€)
 - crucially hinges on TNAC the year before the shock occurs (relevant indicator?)
- modest cumulative absorption: 10-17% of cumulative shock
- see WP for small one-off shocks preserving intake cut-off dates results

	Model 000		Ambition ●O	
How to ra	ise (ETS) a	mbition?		

- General remark: How to express targets?
 - annual targets are tricky/misleading given intertemporal trading e.g. reaching 0 emission in 2050 requires that the cap be zero before 2050
 - even more so true now that the MSR is in place
- Two ways of raising ambition within ETS perimeter
 - higher Linear Reduction Factor
 - reinforced MSR (augmented intake rate and thresholds)
- Not equivalent when firms utilize rolling horizons (inter alia)
 - transitional stringency as important as cumulative stringency if not more
 - $\bullet~$ MSR frontloads abatement effort: more effort perceived early on w.r.t. $\mathsf{LRF}_{\mathsf{eq}}$
- LRF-MSR interaction: complements or substitutes?
 - ambiguous: higher LRF induces shorter banking (and thus MSR intake) period

	Ambition	
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Interaction between LRF and MSR design

Emissions (Mt)						
Intake rate	LRF	2030	2040	2050	Intakes end	Removals (Gt)
	2.20	1,281	848	419	_	0
	4.15	882*	405	148	_	0
	2.20	1,109	674	285	2055	8.71
100/	2.96	882*	401	145	2048	8.51
1270	2.20 ^d	1084	644	282	2057	9.27
	2.94 ^d	882*	409	149	2048	8.60
	2.20	1,106	666	279	2051	8.89
240/	2.89	882*	390	120	2044	9.51
2470	2.20 ^d	1054	587	232	2057	11.0
	2.63 ^d	882*	399	142	2051	11.3
	2.20	1,098	676	280	2050	8.97
260/	2.83	882*	419	129	2045	9.77
3070	2.20 ^d	1040	588	208	2057	11.6
	2.62 ^d	882*	382	118	2052	11.8

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				Conclusion
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Thanks for listening

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Link to LSE WP: Emissions Trading with Rolling Horizons

Emissions Trading with Rolling Horizons

Model

- Competitive intertemporal ETS under uncertainty with supply control
- Firms can use rolling horizon and have bounded responsiveness to control

Calibration

- Parametrization to EU ETS: Supply, demand and market design
- Aim: Match observed annual price and banking levels over 2008-17
- RH reconciles observed bank with implicit discount rates (+better on price)

Simulations (EU ETS Reform)

- 2018 price jump consistent with RH and MSR (irresp. of cancel)
- MSR reduces cumulative cap (even w/o cancel) up to 10GtCO₂ under RH
- Cancellations reduce efficiency loss due to MSR (improvement under RH)
- MSR punctures less of the 'waterbed over time' under RH (but for longer)

Model Structure

- Intertemporal permit market: compliance required at times $t = 1, 2, \ldots$
 - with unlimited banking and limited borrowing (up to next year's free alloc)
- Competitive trading and firms' production decisions are ignored
 - $\bullet\,$ decentralized market equilibrium \equiv joint cost minimization (Rubin, 1996)
- Stochasticity: future baseline emissions are uncertain
 - business cycles, reach of companion policies (e.g. Borenstein et al., 2019)
- Arbitrage $\rightarrow p_t \beta \mathbb{E}_t \{ p_{t+1} \} \ge 0$ in equilibrium (quasi Hotelling's rule)
 - minimization of expected NPV of abatement costs
 - $\bullet\,$ limited borrowing $\rightarrow\,$ non-linearity, no closed-form sol. (Deaton & Laroque)
- Representative firm has infinite or rolling horizon (RH) alternatively
 - RH to deal with uncertainty (use of realistic forecasts) Literature EU ETS evidence
 - Spiro (2014), van Veldhuisen & Sonnemans (2018) with exhaustible resource

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Solution Paths

Infinite horizon (IH): given b_{t-1} , firm minimizes expected NPV of costs

$$\min_{\{e_{\tau}\}_{\tau \geq t}} \mathbb{E}_t \big\{ \sum_{\tau \geq t} \beta^{\tau-t} C_{\tau} (\tilde{u}_{\tau} - e_{\tau}) \big\}$$

subject to $0 \leq e_{ au} \leq ilde{u}_{ au}$ and $b_{ au} = b_{ au-1} + ilde{f}_{ au} + ilde{o}_{ au} - e_{ au} \geq - ilde{f}_{ au+1}$

■ Rolling horizon (RH): optimizes over h years given forecasts x^t_{τ≥t} and only implements date-t optimal outputs and then moves to t + 1

$$\min_{\{e_{\tau}\}_{\tau=t}^{t+h}}\sum_{\tau=t}^{t+n}\beta^{\tau-t}C_{\tau}(\hat{u}_{\tau}^{t}-e_{\tau})$$

 $\text{subject to } 0 \leq e_\tau \leq \hat{u}_\tau^t, \ b_\tau = b_{\tau-1} + \hat{f}_\tau^t + \hat{a}_\tau^t + \hat{o}_\tau^t - e_\tau \geq -\hat{f}_{\tau+1},$

and
$$\sum_{\tau=t}^{t+h} \left[\hat{u}_{\tau}^t - e_{\tau} \right] = \sum_{\tau=t}^{t+h} \left[\hat{u}_{\tau}^t - (\hat{f}_{\tau}^t + \hat{a}_{\tau}^t + \hat{o}_{\tau}^t) \right] - b_{t-1}$$

■ To ensure comparability between IH and RH as h grows: • graphs

- solve IH expected equilibrium path in the first order (Schennach, 2000)
- certainty-equivalent x-paths coincide with forecasts: $\hat{x}_{\tau}^t = \mathbb{E}_t \{ \tilde{x}_{\tau} \}$

Interplay between MSR & Competitive Equilibrium

- Key quantity for firm: expected cumulative abatement effort over horizon
- Interplay between decisions in equilibrium and MSR actions over time
 - zero responsiveness: firm discovers MSR impacts each year w/o anticipation
 - full responsiveness: firm perfectly perceives and accounts for interplay
- Indirect approach is viable without supply control (Samuelson, 1971)
 - MSR only affects market clearing, not intertemporal efficiency (Salant, 1983)
- Fixed-point approach for firm to derive interplay and adjust decisions
 - Equilibrium ≡ fixed point of a mapping between firm's beliefs about MSR impact profile and optimal beliefs (in spirit of Lucas & Prescott (1971))
 - Recursive procedure as firm controls for its truncated horizon (Goldman, 1968) \rightarrow corrected solution path \equiv sequence of first-year optimal outputs

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Cap Trajectory (Supply)



■ cap slope: - 38.3 or 48.4 MtCO₂ p.a. under an LRF of 1.74 or 2.20%

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Baseline CO₂ Emissions (Demand)



Supply & Demand



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Future Demand Forecasts

• Future baseline forecast \equiv deterministic part of AR(1) process \bigcirc graph

$$\hat{u}_{t+1}^t = \varphi(1+\gamma_t)u_t + (1-\varphi)\bar{u}_{t+1}^t$$

• persistence: $\varphi = 0.9$ (Fell, 2016)

- expected future GDP growth rate γ_t (past: EC forecasts; future: 2%/y)
- trend \bar{u} declining over time, in line with companion policies

Forecast period	Climate Energy Package	$ar{u}_{2050}/e_{2008}$	$\bar{u}_t = 0$ in
2008-2013	CEP#1	57.5%	2115
2013-2017	CEP#2	50.7%	2105
2018-2100	Reinforced CEP#2	39.7%	2096

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Ex-Post Calibration (2008-17)

- Assume $C''_t = c > 0$ (recall: linear MACC intercept declining over time)
- Two-step calibration in spirit of std. least squares MLE: graphs
 - calibrate r given h or h given r to replicate observed bank
 - calibrate c given r and h to replicate observed yearly-averaged spot price

Horizon type	Horizon & discount rate	Marginal abatement cost
Infinite	$h = \infty^*$ $r = 7.06\%$ (std.dev = 52.9 MtCO ₂)	$c = 5.53 \cdot 10^{-8} \in /(tCO_2)^2$ (std.dev = 4.04 €/tCO ₂)
Rolling	$h = 13$ $r = 3\%^{\star}$ (std.dev = 64.9 MtCO ₂)	$c = 5.72 \cdot 10^{-8} \in /(tCO_2)^2$ (std.dev = 2.12 €/tCO ₂)

RH reconciles observed bank with implied discount rates (+better on price)

- $r \approx 7\%$ in line with general returns on risky assets (Jordà et al., 2019)
- $r \approx 3\%$ central value for rates implied from futures' yield curves \checkmark data

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Appraising the EU ETS Reform

- Evaluate reform impacts on price/bank paths & cumulative emissions
 - up to 2100 (market terminates before, all permits used well before)
- Reform impacts with infinite vs. rolling horizons
 - No reform/status quo: LRF of 1.74% (NO REF)
 - Without MSR: sole increase in LRF from 1.74 to 2.20% (NO MSR)
 - With MSR but without cancellations:
 - with full (MSR F+N) or zero responsiveness (MSR Z+N)
 - With MSR and with cancellations:
 - with full (MSR F+C) or zero responsiveness (MSR Z+C)
- Focus on cumulative emissions and cost efficiency
- Focus on cumulative emissions and exogenous abatement

Reform Impacts with Infinite Horizon



- Reform hikes prices and reduces banking
 - Small impacts from responsiveness and cancellations
 - MSR intakes stop just before 2040 (followed by ${\sim}15$ years of inactivity)

Reform Impacts with Infinite Horizon



- Reform endogenizes and reduces cumulative emissions
 - With cancellations: cumulative emissions reduced by 5 GtCO2
 - Without cancellations: MSR doesn't have time to empty before market ends

Reform Impacts with Rolling Horizon



- Reform further hikes prices and reduces banking less sharply
 - Responsiveness has greater impacts than cancellations
 - MSR intakes stop just after 2050 + price jump in 2018

Reform Impacts with Rolling Horizon



Reform endogenizes and further reduces cumulative emissions

- Cumulative emissions reduced by 6 (w/o cancel) to 10 GtCO₂ (w/ cancel)
- Larger MSR intakes due to responsiveness coupled with RH

Focus on Cumulative Emissions & Cost Efficiency

- \blacksquare Reform \rightarrow cumulative emissions cap becomes a market outcome
 - $\bullet~ \mathsf{LRF}_{\mathsf{eq}}:$ yields same cumulative emissions w/o MSR as w/ MSR (ref: 2.20%)
 - Efficiency loss: additional total compliance costs under MSR w.r.t. LRF_{eq}?
 - (Interaction: are LRF increase and MSR independent reform features?)

Horizon	Respons.	Cancel.	LRF_{eq}	Efficiency loss	Interaction
	7	Off	2.28%	9.0%	16.4%
Infinite	Zero	On	2.48%	0.2%	4.6%
Infinite	Eull	Off	2.18%	11.5%	11.1%
	Full	On	2.46%	0.2%	3.1%
	7	Off	2.50%	9.0%	11.7%
Rolling	Zero	On	2.70%	0.6%	0.6%
	E.JI	Off	2.59%	7.9%	1.7%
	i uli	On	2.95%	-2.2%	-5.2%

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Focus on Cumulative Emissions & Cost Efficiency

- \blacksquare Reform \rightarrow cumulative emissions cap becomes a market outcome
 - $\bullet~ \mathsf{LRF}_{\mathsf{eq}}$: yields same cumulative emissions without MSR as with MSR
 - Equilibrium price paths under MSR w.r.t. LRF_{eq}?



Focus on Cumulative Emissions & Cost Efficiency

- \blacksquare Reform \rightarrow cumulative emissions cap becomes a market outcome
 - $\bullet~ \mathsf{LRF}_{\mathsf{eq}}$: yields same cumulative emissions without MSR as with MSR
 - Equilibrium price paths under MSR w.r.t. LRF_{eq}?



Focus on Cumulative Emissions and Exogenous Abatement

- \blacksquare Reform \rightarrow non-price driven emission reductions can be made permanent
 - i.e. partial puncture of a 'waterbed effect over time'
 - long-term impacts on cumulative emissions of one-shot marginal shifts in baseline emissions (small enough to avoid changes in cut-off intake date)

Horizon	Respons.	Cancel.	2020	2025	2030	2035	2040
Infinite	Zero	Off/On	53%	42%	33%	19%	6%
	E U	Off	49%	38%	24%	0%	0%
	Full	On	54%	43%	32%	12%	0%
	Zero	Off/On	14%	14%	15%	17%	20%
Rolling	F 11	Off	22%	24%	25%	27%	28%
	Full	On	23%	24%	26%	27%	28%

Year of shift

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Focus on Cumulative Emissions & Exogenous Abatement



Note: Case with the cancellation mechanism and full responsiveness.

• $Y_t^{RH} < Y_t^{IH}$: less room to spread X_t and higher bank to start with • $W_{cumul}^{RH} > W_{cumul}^{IH}$: more time to absorb bank increment

Planning with Rolling Horizons (Literature 1)

- The more distant future is more uncertain in terms of
 - possible outcomes, their probabilities and how to incorporate them in planning
- Rolling horizons to deal with increasing uncertainty, informational constraints/requirements and cognitive limitations
 - Agents resort to heuristics or rules of thumb (e.g. Gigerenzer & Selten, 2003)
- Concept of RH first formalized by Goldman (1968), extended to
 - stochasticity and stationarity (Easley & Spulber, 1981)
 - capital accumulation (Kaganovitch, 1985)
 - strategic interactions (Jehiel, 1995)
 - nonlinear model predictive control (Grüne et al., 2015)
- \blacksquare RH = crude but simple way of modeling behavior in face of ambiguity
 - ambiguity aversion with maxmin decision rule (Gilboa & Schmeidler, 1989)
 - spasity-based bounded rationality (Gabaix, 2014)
 - rational inattentivess (Reis, 2006; Sims, 2006)

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Planning with Rolling Horizons (Literature 2)

RH used in production planning and supply chain (Sahin et al., 2013)

- permits are one factor of production (Zhang & Xu, 2013)
- RH help rationalize quantitative puzzles
 - saving behaviors (Caliendo & Aadland, 2007)
 - social security choices (Findley & Caliendo, 2009)
 - long-run price dynamics of exhaustible resources not conforming to Hotelling's rule (Spiro, 2014; van Veldhuizen & Sonnemans, 2018)
- Rich experimental literature on dynamic decision problems:
 - deviations from rational expectations (Carbone & Hey, 2001)
 - behavioral expectations & adaptive heuristic switching (Hommes et al., 2019)
 - limitations on how far ahead people can plan (Hey & Knoll, 2007)
 - traders myopic (Smith et al., 1988) or use past trends (Haruvy et al., 2007)

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Planning with Rolling Horizons (EU ETS)

- Intra-firm constraints restrict reach of intertemporal considerations
 - standard in-house risk management procedures apply
 - \rightarrow power firms partially hedge future prod. up to 3 years (Eurelectric, 2009)
 - ightarrow beyond hedging target, banking only at much higher rate (Schopp et al. 2015)
 - stockpiling limited by willingness to tie up capital (Dardati & Riutort, 2016)
 - banking justifiable when carbon trading is not one's core activity?
 - hoarding permits can trigger concerns about cornering and manipulation
- Futures markets provide proxies for foresight and discount rates
 - $\bullet\,$ maturities up to 10 years ahead & liquidity quickly \downarrow with time-to-maturity
 - discount rates implied from futures' yield curves are 'low' educated
- Regulatory uncertainty: firms may excessively focus on the short term
 - regulation is changing and only set for a dozen years ahead <a>timeline
 - credibility of the regulator to intervene to 'fix the market' (ETS, RIP?)
 - vagueness of the regulatory language example:cancellations

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EU ETS Regulatory Timeline



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Market Stability Reserve (Soft Banking Collar)

- From 2019 on: automatically adjusts a_t based on past banking
 - if $b_{t-2} > 833$ million: $0.24 \cdot b_{t-2}$ withheld from auctions (0.12 after 2023)
 - if $b_{t-2} < 400$ million: 200 million added to auctions (100 after 2023)
 - stock of permits in MSR satisfies complementary dynamics (+initial seed)
- In principle: cumulative cap preserved (~auction schedule reshuffling)
 - provided that the MSR has time to release all set-aside permits
- From 2023 on: add-on cancellation mechanism breaks neutrality for sure
 - any permits in reserve in excess of previous year's auctions are cancelled
 - $\bullet\,$ endogenizes the cumulative cap: depends on past & future market outcomes
 - regulatory vagueness: validity, should vs. shall vs. will, pending 2021 review

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Infinite vs. Rolling Horizons

Under perfect foresight, no supply control and yearly binding caps

 $\bullet\,$ Qualitatively: shorter horizon \sim larger discount rate



Infinite vs. Rolling Horizons

Under perfect foresight, no supply control and yearly binding caps

 $\bullet\,$ Qualitatively: shorter horizon \sim larger discount rate



Actual Baseline vs. Forecasts



Calibration Results



Implied Discount Rates (2008-17)

Daily yield curve	Mean	Median	Std.Dev	Min	Max
Fut. Dec Y $+1$ / Spot	2.4%	2.5%	1.5%	0.2%	7.0%
Fut. Dec Y $+1$ / Fut. Dec Y	2.9%	2.6%	1.8%	0.3%	8.7%
Fut. Dec Y+2 / Fut. Dec Y+1	3.6%	3.7%	2.0%	0.2%	8.7%
Fut. Dec Y+3 / Fut. Dec Y+2	4.1%	2.5%	2.0%	0.6%	9.2%



Yield Curve: Fut. Dec Y+1 / Daily Spot (2008-17)



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